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ABSTRACT

A study examined the journalistic codes of ethics from 23 countries involved in the Conference on Security and Cooperation in Europe (CSCE), using descriptive and interpretative content analysis. The contents of the 24 codes from the 23 countries were divided into explicit categories on the basis of a 17-part classification scheme, including: "truth," "acquisition of facts," "professional secrecy," "freedom of information," "professional integrity," "human rights," and "values." Results indicated that: (1) the most important principle in all the codes was represented by truth; (2) the general rule on acquisition and checking of facts was that journalists should use open and honest means to acquire information; (3) confidentiality of sources must be maintained; and (4) freedom of information figures prominently in nearly all of the codes. Findings suggest the development among the CSCE countries of some sort of basic, universal model of journalistic codes where the accent is on truth, freedom of information, and protection of the individual. Studies like this one point to the increasing urgency for research on the "new Europe" and its rapidly changing cultural landscape. (Twenty-one references, a list of the codes of ethics examined, and a list of publications in English and Swedish of the Department of Journalism and Mass Communication of the University of Tampere are attached.) (RS)

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JOURNALISTIC CODES OF ETHICS IN THE CSCE COUNTRIES

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Tampereen yliopisto
Tiedotusopin laitos
University of Tampere
Department of Journalism and Mass Communication

Series B 31/1991

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Preface

This volume is an abridged and updated version of my Master's Thesis that was approved at the Department of Journalism and Mass Communication, University of Tampere, in spring 1989 ("Human rights and journalistic ethics: A study of the journalistic codes of ethics in the CSCE countries").

The original study was twice the length of the present version, from which I have edited out the original chapters on human rights. Nevertheless the classification scheme I am using here is based not only on the internal structure of codes of ethics, but also and importantly on the human rights specified in international human rights conventions.

The past two years have seen many dramatic changes on the European continent. The divide between East and West has disappeared, the Warsaw Pact has collapsed, and power has changed hands in most Eastern European countries. There has been growing recognition and acceptance of the traditional Western conception that human rights are to do with individuals rather than state actors; this is now the prevailing view even in the Soviet Union. The European revolution has also had profound effects on the structures of mass communication and on the journalistic ethics of Eastern Europe.

Several journalistic codes of ethics have been revised or completely rewritten since I completed my thesis. The German Democratic Republic, which was still included in my original study, has completely disappeared from the world map. I have also had access to two Western codes (those of Iceland and Greece) which were not included in the 1989 study. In addition, the Soviet draft code was officially adopted in a slightly revised form at the time that this text was being translated into English. In short: I have had to revise my study in many important respects.

I want to express my warmest thanks to the International Journalism Institute for providing the research material, i.e. the journalistic codes of ethics. Special thanks are also due to professor Kaarle Nordenstreng: it was his great enthusiasm that encouraged me to pick up this project again, two years after I had put it aside. Thanks to the Union of Journalists in Finland and the Copyright Fund for their generous grant.

Finally, I would like to dedicate this study to my wife Annmari.

Kuopio, 26 May 1991

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Introduction

1.1. International human rights

Since the classification scheme used in this study is largely founded on international human rights conventions and since human rights were in fact the starting-point proper for this study, it is perhaps appropriate to begin with a few words on that subject.

The concept of human rights is not unproblematic. The basic premise is that human rights are universal, that is to say equally applicable to all human beings. The philosophical foundations of human rights can be traced back to the notion of natural rights, the view that humanity itself guarantees certain basic rights to all human beings.

All human rights conventions and agreements adopted within the United Nations system stress that all people regardless of race, sex, age, or other such factors are entitled to the rights identified in these instruments. Indeed a central thread that runs through all human rights agreements is the prohibition of discrimination.

The first problem, then, is to define those rights that are accepted as 'human rights', i.e. rights belonging to every individual on grounds that he or she is a human being.

A distinction is made between first, second and third-generation human rights. First-generation human rights consist of the rights of citizenship and political rights, the most fundamental type of basic right. They have an impressive history ranging from the Magna Charta and the US Declaration of Independence to the celebrated principles of the French Revolution, which were recorded in the Declaration of the Rights of Man and of the Citizen (Declaration des Droits de l'Homme et du Citoyen).

Second-generation rights consist of economic, social, and cultural rights (ESC), which are safeguarded chiefly through social legislation. Examples include the right to nutrition, residence, basic education, and work — things we do not often associate with basic rights but tend to take for granted.

Third-generation human rights are of a collective nature, and have most forcefully been advocated by developing countries. The right to peace, environment, and development are included in this category.

An important collective right and at once one of the basic principles of international law is the people's right to sovereignty. As a general rule the state must enjoy the right freely to decide on its own internal affairs; external interference in state sovereignty is not permitted. In earlier decades this principle was stressed most particularly by the socialist countries who did not want the Western countries to interfere in what they regarded as their internal affairs.

In the preparation of the UN agreements on civil and political rights and ESC rights, for instance, the Soviet Union repeatedly pointed out that the project had to be carried out on a cooperative basis: it would accept no interference in its internal affairs, since that would be in violation of the United Nations Charter. When it eventually accepted the control system attached to the civil and political rights covenant, the Soviet Union stressed it had done so on the understanding that this was a voluntary arrangement. The control system requires all member states to supply periodic reports to the UN human rights committee, which will make general comments on the basis of its examinations. The earlier Soviet interpretation of this was that the human rights committee did not have the right to address its comments to any particular state, for the implementation of human rights remains within the internal jurisdiction of each state. (Jhabvala 1985)

During the past two years these contradictions in principle between East and West have largely disappeared, with the Western interpretation of human rights gradually gaining recognition among former Eastern European countries. However, there are still occasional controversies: in early 1991, for instance, Moscow argued that the steps it had taken in the Baltic countries were strictly internal affairs and the Western countries had no right in interfering.

But the most significant differences of interpretation are now found between Third World dictatorships, the Islamic world and the Western world.

The original study examined in great detail the human rights specified both by the UN system and by the European human rights system. They are basically very similar to each other.

The most important agreements adopted by the UN are the 1966 International Covenant on Civil and Political Rights and the International Covenant on

Economic, Social and Cultural rights from the same year. These were based on the Universal Declaration of Human Rights, adopted by the UN General Assembly in 1948, which is the best-known human rights document in the world. In addition, the General Assembly adopted in 1963 a Convention on the Elimination of all Forms of Racial Discrimination, which directly addressess one of the most central principles of human rights.

The European human rights system is constituted by the European Convention for the Protection of Human Rights and Fundamental Freedoms, a convention drawn up in 1950 by the Council of Europe, the European Social Charter, and the CSCE documents concerning human rights.

One useful starting-point for defining human rights is an examination of the contents of the documents mentioned. The UN Declaration of Human Rights is universally known, but it is only a declaration, not an agreement. On the other hand, the 1966 covenants as well as the Convention on the Elimination of all Forms of Racial Discrimination are binding upon the countries that have ratified these instruments, which is not an insignificant number: for instance, by 1 March 1991 the Civil and Political Rights agreement had been ratified by 93 countries. We can therefore argue that the rights specified in these documents are regarded by the majority of the international community as human rights.

1.2. Human rights and journalistic codes of ethics

The original study of journalistic ethics revealed a number of similarities with human rights. The basic strategy of that study was to translate human rights into the language of journalistic ethics, i.e. to establish how far basic human rights such as the "right to privacy" is taken into account in the journalist's job.

This abridged version does not include the original chapter which examines the results of my classification from the point of view of human rights. However, a few comments are in order:

Freedom of speech is a basic premise of journalistic ethics and an extremely important human right. In a sense, journalistic ethics defines the enlightened use of freedom of speech.

Another area where there is a natural connection between journalistic ethics and human rights is represented by the rights of the individual. The protection of family, integrity, private life, and reputation translates into respect for human dignity. This is also acknowledged in journalistic ethics; whether it is acknowledged in journalistic practice is a different matter.

Freedom of conscience is a basic right which in Finland, for instance, is incorporated in the collective labour agreement for professional journalists. This right is also mentioned in many journalistic codes of ethics.

Economic, social and cultural rights and third-generation rights are both fairly conspicuous in their absence from codes of journalistic ethics. Indeed it is quite difficult to formulate these in other than rather superficial terms, such as "a good journalist shows respect for and seeks to promote human rights, including economic, social and cultural rights."

1.3. Earlier studies and research method

There is some earlier research in Finland on the relationship between human rights and mass communication. For example, Taisto Hujanen (1989) from the Department of Journalism and Mass Communication, University of Tampere, has studied the role of communication in the realization of immigrant workers' human rights.

There are four earlier studies on journalistic ethics which deserve to be mentioned here. Harri Leppänen (1977) described the role of national and international journalistic codes in society, and analysed in detail 39 different codes of ethics. Antti Alanen (1979) explored the connections and similarities between journalistic codes of ethics and international law. The short history of journalistic ethics by Lars Bruun in *Professional Codes in Journalism* (1979) and his classification of 59 codes have been of great help to me in this study. Finally, mention should also be made of Clement Jones's *Mass Media Codes of Ethics and Councils* (1980), which appeared in the UNESCO series Reports and Papers on Mass Communication.

My research material consisted of 24 journalistic codes of ethics from 23 countries involved in the Conference on Security and Co-operation in Europe (CSCE), which from the human rights and journalistic ethics point of view constitute a relatively coherent entity. Human rights are of central importance to the CSCE system, and within this area the polarization of the world into East and West was very clearly visible before the Eastern European revolution.

The material is examined using the method of descriptive and interpretative content analysis, the aim being to divide that material into explicit categories on the basis of a certain classification scheme. The analysis is based on the contents of these categories, which are presented at the end of Chapter 2. Before that, however, Chapter 2 looks briefly at the history of journalistic ethics and introducea the codes included in the analysis. In Chapter 3 the codes are analysed in detail, following the structure of the classification scheme. The results are also presented in tabular form. Chapter 4 summarizes the main results of the analysis.

2. Journalistic Ethics

2.1. Concept and history

Journalistic ethics are basically to do with freedom and the responsibilities that go together with freedom. Responsibility means an awareness of the fact that other people have rights as well and that those rights must be taken into account in the exercise of one's own freedoms. This also applies to the exercise of freedom of speech.

Lars Bruun and Kaarle Nordenstreng define journalistic ethics as the set of societal and professional intentions and principles of action that journalists are expected to follow in the conduct of their profession. The control function rests with the journalistic profession itself. Typically, the ethical ground-rules are defined and controlled by the journalists' own professional organization or some other union; sometimes there is also cooperation between different interest groups, such as in the form of a joint body of journalists and publishers. In a number of countries there are also councils of the mass media, which sometimes include representatives of the lay public. (Bruun & Nordenstreng 1979)

This study looks at journalistic ethics on the basis of a content analysis of different codes (or 'rules' or 'deontologies') of journalistic ethics. We shall not be examining the regulations governing the work of councils for mass media.

Why do we have these codes of journalistic ethics? One of the basic motives for journalistic ethics, at least in democratic countries, is to maintain the confidence of the general public in the mass communication, and highlighting the importance of good professional conduct is a useful way of telling people that journalists are aware of their responsibilities. Self-control also serves to convey the message to government authorities that no external regulations are required. Professional ethics is also important for reasons of professional identity. Finally, journalistic ethics provide a safeguard against external influences and often against one's own employer, i.e. the right to refuse assignments that are against one's convictions and conscience.

Clement Jones says that journalistic ethics have three central functions. First, to protect the public from irresponsible, asocial and propagandistic use of the mass media. Secondly, to protect journalists from being forced into irresponsible or humiliating behaviour or any activity which is against their conscience. Third and finally, the purpose of journalistic ethics is to keep the channels open both from above and below. By this Jones means that journalists must have continuous and free access to sources of information, and on the other hand journalists must be given the opportunity to communicate public opinion to political decision-makers. (Jones 1980, 14)

According to Jiri Kubka and Kaarle Nordenstreng it is important to bear in mind that the ethical orientation of journalists was not originally a means of defence against external influence. Ethics have always been central to journalism, which started as a form of socio-political missionary work. Part of that social ethos is still present in journalism today. (Kubka & Nordenstreng 1986, 44)

The first written ethical code saw the light of day in Sweden in 1900. This was never formally adopted, but in 1923 the Swedish Publicistklubben sanctioned a set of ethical guideliness that were drawn up at the press committee's (est. 1916) instigation. (Bruun 1979, 17-18)

But the journalists of Poland were four years ahead of their Swedish colleagues: in 1896, the journalist organization of Galicia, then a crown land of Austria-Hungary, recognized in its foundation charter the tribunal of honor and spelled out a list of moral regulations which all members were obliged to follow. (ibid., 17 and 19)

The first ethical code to be formally adopted was the "Charte des devoirs professionnels des journalistes francais"; this was issued and adopted in 1918 by the French Syndicat National des Journalistes. Since then the code has been revised twice. (ibid., 17; Vuortama 1984, 15)

Norway has also been one of the pioneers in the field of journalistic ethics. The Norsk Presseforbund, consisting of publishers, editors-in-chief and reporters, adopted in 1936 an ethical code called "Journalist vaer varsom". The Board of the Union of Journalists in Finland (Suomen Sanomalehtimiesten Liitto — SSL) adopted in February 1927 the Tribunal of Honour (an organ similar to today's council for mass media) rules of the Finnish press. Publishers had no representation on the Court, and in practice it had no major influence. In 1968, the SSL adopted a new ethical code ("Guidelines for Good Journalistic Practice") which has been revised in 1976 and 1983. The Council for Mass Media was also established in 1968.

The first American code was adopted in 1923. A major step towards the establishment of an international code was taken in Washington, USA, when the first Pan-American press conference adopted a code consisting of nine articles. The code was ratified by the Inter-American Press Conference in 1950. (Bruun 1979, 18)

In the 1920s, the International Labour Organization (ILO) conducted a survey into the working conditions of journalists in different parts of the world; the study was carried out at the initiative of two international journalist organizations, the International Association of Journalists and the International Federation of Journalists. The ILO report, published in 1928, contained numerous references to journalistic ethics, including recommendations for the establishment of councils for mass media (ibid., 18-19; Jones 1980, 10-11)

The League of Nations was also showing growing interest in journalism; after all its chief task was to help consolidate peace in the world, and the press was considered to play a major role in this effort. In 1927, 1932 and 1933, the League of Nations convened various expert conferences dealing with the press and mass communication. In 1936, it adopted the "International Convention Concerning the Use of Broadcasting in the Cause of Peace", which is one of the few international agreements directly relevant to mass communication. (For a more detailed description of the League of Nations and journalists, see Kubka & Nordenstreng 1986, 69-73).

The idealistic views prevailing at the time found expression in the International Tribunal of Honour for Journalists, which was founded in 1931 and which made its decisions on the basis of an explicit ethical code. The Tribunal was established by the Federation International des Journalistes (FIJ) and the association of journalists accredited to the League of Nations. The Tribunal's original intention was to focus on false and falsified information, but with the rapid deterioration of the international situation the journalist organizations behind the Tribunal were unable to exert sufficient influence upon their memberships. The Tribunal of Honour never properly got off the ground. (ibid., 63-69; Nordenstreng 1986, 311-312)

In 1936 the International Union of Press Associations (IUPA; a publisher-dominated association) adopted a declaration of press ethics: "A journalist worthy of the name". The FIJ adopted its own ethical code on the eve of the Second World War in 1939. (ibid., 312)

Inspired by the 1948 conference on the freedom of communication, the United Nations started in 1950-1952 to prepare draft international code of journalistic ethics. However, the draft did not receive sufficient backing, and discussions were discontinued by a General Assembly resolution in 1954. (ibid., 312; Bruun 1979, 21-22)

A report by the UN Economic and Social Council provides a summary description of the issues discussed at the 1948 conference. Its chief purpose was to discuss methods that could help to improve the quality of mass communication, to achieve greater accuracy, objectivity, coverage, and representativeness. One of the strategies proposed was to encourage professional organizations in the field of mass communication to establish their own ethical standards. (Historical Documents on the Mass Media 1987, 133)

The conference also looked into the possibility of creating an international code (or codes) of journalistic ethics. It recommended that the code be formulated 1) by convening a conference for professionals in the field of mass communication; or 2) by requesting the relevant organizations to draw up their own codes; or 3) by the UN conference preparing a model code. (ibid., 133)

The conference had at its disposal five more or less international and 11 national codes. Eight of these were selected for closer inspection and classification. ECOSOC identified seven categories that it thought could serve as a basis for preparing a genuinely international code. These were: 1) telling the truth without malice or prejudice, 2) using honest methods, 3) showing respect for professional integrity and responsibility, 4) discretion, 5) working for the solution of economic, social and humanitarian problems, 6) helping to strengthen respect for human rights, and 7) assisting in the maintenance of international peace and security. (ibid., 134-153)

The Mass Media Declaration adopted by UNESCO in 1978 cannot be regarded as an ethical code proper, but it has nevertheless inspired the development of journalistic ethics throughout the world (Nordenstreng 1986, 312-313).

Following a series of meetings under the auspices of UNESCO, a representative group of international and regional organizations of journalists issued in December 1983 an impressive collection of ethical guidelines under the title "International Principles of Professional Ethics in Journalism"; this is the most extensive international document of its kind. According to the preface, it is a set of principles which "is intended to be promoted autonomously by each professional organization through ways and means most adequate to its members." The organizations behind this recommendation represent altogether 400,000 working journalists and every geopolitical region in the world. It also covers the entire ideological spectrum from Communists to Christian Democrats. (ibid., 313-314; Vuortama 1984, 17 and 187-190).

The opening lines of Principle VIII are worth separate attention here: "A true journalist stands for the universal values of humanism, above all peace, democracy, *human rights*, social progress and national liberation (...)"

There are dozens of countries in the world which have their own national codes, including many developing countries. Some of them have been produced by the journalist profession itself, while others are based on law or some other official norm. In some countries different media have their own ethical codes, in others the same codes apply across the whole spectrum of mass communication. (Vuortama 1984, 15)

Clement Jones makes a distinction between two different types of ethical code: compulsory and voluntary. Compulsory codes impose sanctions for violations of the rules, whereas the latter are voluntary guidelines where sanctions are usually restricted to public reprobation. The scopes and intentions of different codes may vary considerably, but even so there are many common factors. This is clearly demonstrated by the following analysis of the journalistic codes of ethics of the CSCE countries. (Jones 1980, 14-16)

2.2. The CSCE and journalistic responsibility

The Conference on Security and Co-operation in Europe consists the 35 states that signed the Helsinki Final Act in 1975. This is not, however, a very coherent group, at least as far as political and economic systems or culture and religion are concerned; in spite of many similarities, there are also broad differences. Nevertheless all the participating states have more or less close links with the European cultural heritage, the European world — including the United States and Canada, which remain in close contact with the old continent.

Taken as a whole, the CSCE group has the world's most highly developed and the most sophisticated system of mass communication. That system has long traditions: modern communications has occupied a key place in the social life of these countries for much longer than anywhere else in the world. The same applies to journalistic ethics, which have a firm established position in most CSCE countries.

The CSCE process has consisted in a series of compromises between the Western and the Socialist world, with the neutral countries serving as the chief mediators. Although the practical recommendations made by the CSCE in the field of communication are based on the Western free flow ideology, we must interpret these Third-Basket recommendations against the spirit of the Helsinki Final Act in its entirety. The aim is "freer and broader dissemination of all kinds of information", but no absolute criteria have been set for what is meant by free. (Nordenstreng 1975, 58)

Throughout the CSCE process one central object has been the removal of obstacles to free communication and the improvement of journalists' working conditions.

According to Kaarle Nordenstreng, the CSCE document served to strengthen certain external rules of behaviour even in the field of communication [the responsibility to act in accordance with the principles of the international law — PJ]. It did not, however, establish how the spirit of Helsinki should be translated into practical journalism — without censorship or even formally adopted and binding norms. That was mostly left to self-control, to the development of professional ethics. (ibid., 63) The impact of the CSCE is visible then in the 1983 "International Principles of Professional Ethics in Journalism" (Nordenstreng 1985, 67).

Journalists have also organized their own "mini-CSCE conferences". The first was held in 1985 in connection with the tenth anniversary of the CSCE meeting in Helsinki. Under the title "Ten years after Helsinki — journalists and détente", the conference discussed, among other things, questions of responsibility in journalism. Although the journalists who took part were there as individuals or possibly as representatives of some journalist organization, they obviously dealt with issues of responsibility from the vantage-points of their respective social systems.

Pravda commentator Vitali Korionov suggested that the ten basic principles of the CSCE be adopted as the ethical guidelines for journalism. He said that journalists must recognize their role and responsibility in the international dialogue, and avoid sowing hatred and suspicion. (Proceedings of the Congress

1986, 36-37)

William Pfaff, commentator for *International Herald Tribune* and the *New Yorker Magazine*, took a critical position on journalistic responsibility in international mass communication. To whom, he asked, are journalists responsible? The standard answer of course is: to the reader; but in what sense? Pfaff said this must not mean that the readers are given what they want — this would only serve to make mass communication more entertaining. However, the opposite policy of always doing what the owner wants you to do (which is how the yellow press operates) is even less desirable: Pfaff makes a distinction between "Anglosaxon" and European "interpretative" journalism, which nevertheless have one important thing in common: they agree that the journalist's first responsibility is to provide the free readers with a truthful account of what has happened. Even at the risk of ethnocentrism, he argues that Third World "guidance" journalism is immature. Pfaff insists that it is "false consciousness" to say that any government or self-fulfilling oligarchy has the right to decide what their subjects are entitled to know. The journalist, Pfaff says, is responsible to himself. That responsibility applies primarily to telling the truth. Peace, disarmament, avoidance of war, development, international friendship, even freedom — all these come second. (ibid., 42-45)

Truth is indeed a central precondition for all these 'secondary factors'. In this sense the quest for truth, objective reporting — understood as truthfulness and essentiality — is the most important rule of journalistic ethics.

But in the search for truth, the journalist must also comply with the other rules. That makes things much more complicated: it is not always easy to decide whether or not the truth can be told. Besides, how does the journalist decide what is the absolute truth? For instance, in some cases telling the truth may be in conflict with the protection of privacy, and the journalist will have to make a choice to decide which is more important. No universal set of rules can be provided, and therefore the decisions have to be made separately for each case.

What about the question of responsibility? We can distinguish between at least four different levels of responsibility. The journalist has at least a moral responsibility to the international community for complying with international law. Secondly, the journalist is responsible to his or her own society: in order to protect the basic rights of other people, it is essential to observe the law and to follow the rules of society. Third — and this constitutes a fundamental premise of journalistic ethics — the journalist is responsible to his or her audience.

Finally, the journalist is responsible to his or her own conscience.

Even these responsibilities may clash in many ways. For example, it is possible that a certain law in society is in conflict with the three other spheres of responsibility. Again, the journalist must make the final choice of priority separately for each case. Ultimately that decision may hinge upon the good journalist's conscience, but even s/he needs to be well-informed about national legislation and international law.

A second mini-CSCE conference was convened in Vienna at the end of 1987 under the heading "Journalism and state security needs". The conference expressed its full support to the CSCE process. In their final communiqué the participating journalists said they were agreed with the signatories of the Helsinki Final Act on the need to strengthen peace and mutual understanding among nations and to enrich human personality irrespective of race, sex, language, or religion. They took note of the positive development in the freedom of communication, but at the same time reminded governments that there still remained certain obstacles. The participants also said they thought journalists should not be discriminated against and that they should be given every opportunity to do their job in accordance with the profession's ethical norms.

2.3. The journalistic codes of ethics of the CSCE countries

The analysis covers 24 ethical codes from 23 countries. The British code also applies to the Republic of Ireland. As well as studying the CSCE group as a single category, we will also be looking separately at the Nordic group, other Western countries, and Eastern European countries. The latter include the former socialist countries plus Yugoslavia and the Soviet Union, where the Communist party remains in power.

The Nordic countries form a rather distinct group which is united not only by geography: they also share a common history, a common cultural heritage, and also the same politico-economic social system. With the exception of Finland, the Nordic countries also have very closely related languages. Journalists enjoy a relatively high social status in the Nordic countries, which is also reflected in their income levels. Recent years have seen a revolution in the field of mass communication with the rapid growth of electronic communication and intensified competition. This may generate increased pressures in the direction of professional ethics. (Vuortama 1989)

The latest version of the Finnish code "Guidelines for Good Journalistic Practice" dates from 1983; it is currently being revised. The code has been adopted by the Union of Journalists in Finland (SSL), and it applies to all journalistic work regardless of the medium.

The Swedish code (last revised in 1990) is called "The Code of Conduct for Press, Radio and Television". The code has been adopted by the Cooperation Council of the Press in Sweden.

The Norwegian code — "Code of Ethics" — has been adopted by the respective organ, i.e. the Norwegian Press Association. The latest version of the Norwegian code is from 1987.

The Danish code of ethics dates from 1981 and is called "Rules of Good Journalism". It was jointly prepared by representatives of the press and radio reporters, but so far it has only been approved by the publishers' association Danske Dagblades Forening. In 1990 the committee for media responsibility in Denmark launched a proposal for ethical rules of the press. At the time that this is going to print, the fate of that proposal remains unclear.

The Icelandic code is called "Rules of Ethics in Journalism". It was adopted by Iceland's Union of Journalists in 1988.

All countries of Western Europe can be described as bourgeois democracies, even though some of them have long histories of military rule. Western Europe (in which I have also included the United States and Canada) constitutes a relatively distinct and homogenous group. The press is privately owned, and government ownership of electronic media varies from country to country.

The code of ethics applied by the Federation of Dutch Journalists is the "Professional Code of Journalism", which was adopted by the International Federation of Journalists in Bordeaux in 1954. The latest revisions to this code were made in 1986.

The Belgian code is called the "Code of Journalistic Principles". It has been adopted by both the Belgian Association of Newspaper Publishers and the General Association of Professional Journalists of Belgium in 1982.

The Spanish code has (to the best of my knowledge) been adopted by the State Office for Information in 1980. However, the status and nature of this code — "General Principles of Journalistic Profession" — remain unclear, and therefore it is excluded from this study.

Irish journalists do not have a union of their own but are affiliated to the British National Union of Journalists (NUJ), which represents some 33,000 British and Irish journalists. The NUJ's "Code of Professional Conduct" was last revised in 1987. (McGuigan 1989)

Italy's code is called the "Principles of Professional Ethics of the National Council of the Italian Press", which was adopted in 1957 by the publishers. The Austrian Press Council published its code in 1983: "Principles Governing Journalistic Work: Code of Ethics for the Austrian Press".

In Greece, the members of Editorial Boards of Athens Dailies adopted in June 1978 a code called "Ethical Morals".

The Portuguese "Deontology Code of Journalists" was adopted by the Union of Journalists in 1976.

France has several journalist organizations and no single ethical code. Valid codes are binding upon signatories only (Topuz 1989). The oldest code is the "Charter of the Professional Duties of French Journalists" (*France I*) adopted by the National Syndicate of French Journalists in 1918 and ratified in 1938. The second French code included in our analysis is the "Declaration of Ethical Principles of the Journalistic Profession" (*France II*), which was submitted by the SNJ-CGT syndicate as part of the national collective labour agreement in 1977.

The FRG code was adopted in 1973 by the German Press Council, which consists of representatives of both publishers and journalists. The code is called the "Journalistic Principles" (Press Codex), which was last revised in February 1990. Following the unification of Germany in October 1990, the FRG code of ethics now applies to the whole of Germany. In addition, the German Magazine Organization has a separate code (the Code of the German Magazine Organization), which was adopted in 1966 by *Stern*, *Quick*, *Revue* and *Neue Illustrierte*. This is a special code which prohibits obscenity, brutal presentation of violence and accidents, racial discrimination, and war propaganda. Since I have no reliable information on the present status of this code, I have decided to exclude it from the study.

In Switzerland, the Swiss Press Association (a publisher organization) adopted in 1972 a code called the "Declaration of Duties and Rights of Journalists". The content of this code is almost identical to the "Munich Declaration" jointly prepared by six European journalist organizations in 1971.

The Turkish code — the "Professional Principles of the Press" — has been adopted by the Turkish Press Council in April 1989. Turkey is the only Islamic CSCE country. Turkey has had many long-standing military governments, and even today it is doubtful whether there is real freedom of speech in the country.

In the United States there are a number of journalist organizations. The biggest organization is The Society of Professional Journalists, Sigma Delta Chi, which has a membership that covers 17 % of all professional journalists in the country (Sprungen Bildner 1989). The Sigma Delta Chi code was last revised in 1987.

In Canada, there is no generally adopted code. The Canadian Association of French Language Journalists adopted a code called "Charter of Professional Integrity" in 1964.

Cyprus has no code of ethics (Jones 1980, 18). According to the inventory of the International Journalism Institute (Professional 1989), the same goes for Malta, Liechtenstein, Luxembourg, the Vatican, and San Marino.

* * *

The Eastern European revolution, the collapse of the Communist regime in 1989 and 1990 was an extremely sudden and rapid process; it is still unclear exactly what will emerge as a result of these dramatic developments. What we can say with reasonable certainty is that the mass communication systems in these countries are going to see some very profound changes — indeed they already have. These changes are bound to be reflected in journalistic ethics as well.

At the time that I wrote my original study, Europe was still divided into two distinct blocs in a very concrete way. I have retained this basic distinction for the present analysis, partly for historical (and geographical) reasons.

Within Eastern Europe we can make a further distinction between three different groups. The first consists of the German Democratic Republic (now part of the Federal Republic of Germany), Poland, Czechoslovakia, and Hungary, which have all witnessed a total collapse of the old political and communication order. The second consists of Bulgaria and Rumania. In the June 1990 elections, Bulgarian Communists (now the Bulgarian Socialist Party) won an absolute majority in Parliament. Former Communists are also represented in the leadership of the National Salvation Front in Rumania. The third group consists of Albania, Yugoslavia, and the Soviet Union. At the time that this is being written, the future of Albania (which is not a CSCE country) remains unclear, and Yugoslavia, now governed by Serbian Communists, is torn by serious nationality disputes. In the Soviet Union, which started the upheaval with Gorbachev's glasnost and perestroika, the conservative influence is becoming increasingly powerful. The Soviet Union, too, is threatened by dissolution with many of its republics now fighting for independence.

The eradication of the bureaucratic system of mass communication and journalism that was centrally controlled by the Communist administration forms an important part of the political liberation of Eastern Europe. Censorship has either been completely eliminated or substantially reduced. However, neither the elimination of censorship nor even the security of journalists is fully guaranteed; there are examples of major setbacks on the road to freedom at least from Rumania, Yugoslavia, and the Soviet Union.

There are also major obstacles on the road to market economy. Production technology in Eastern Europe is largely outdated, national economies are extremely weak, and unemployment levels are high; the latter problem affects journalists as well. There is also the risk that the place of state monopolies is taken over by private communications monopolies. A change of attitude is also needed: journalism must now move towards independent, critical, and more objective reporting.

In the first category of Eastern European countries, East Germany has ceased to exist and therefore the Statutes of the Association of Journalists of the GDR — which was included in my original study — is no longer valid.

The change of power in Poland has not yet brought about a new journalistic code. However, the "Moral Code for Journalists" was originally adopted in 1945 by The Trade Union of Journalists of the Republic of Poland, which was active before the rise to power of the Communist government. It has been revised on a number of occasions, and it was last adopted by the Association of Journalists of the Polish Democratic Republic in 1987. There is reason to believe that Polish journalists will revise their code in the near future.

As implied by its name, the code of the Czechoslovak Union of Journalists — "Principles of Ethics of a Socialist Journalist" — from 1977 represents the thinking of the old socialist rule and is therefore excluded from the study.

The Hungarian "Code of Journalists' Ethics" was adopted in September 1989 by the General Assembly of the State Union of Hungarian Journalists.

In Bulgaria, which is included in the second group of Eastern European countries, the code now in force is called the "Rules of Journalistic Etiquette",

Table 1
Countries included in the study and the nature of their ethical codes. Adopted by a journalist organization (J), journalists and publishers (J&P), publishers (P), press council (C).

Country	J	J&P	P	C
Nordic countries				
Denmark			x	
Finland	x			
Iceland	x			
Norway		x		
Sweden		x		
West European countries				
Austria				x
Belgium		x		
Germany (FRG)				x
France I	x			
France II	x			
Greece		x		
Italy			x	
Netherlands	x			
Portugal	x			
Switzerland			x	
Turkey				x
UK/Ireland	x			
North American countries				
Canada	x			
USA	x			
East European countries				
Bulgaria	x			
Hungary	x			
Poland	x			
Soviet Union	x			
Yugoslavia	x			
Total	14	4	3	3

The majority of the codes have been adopted by journalists or by journalists and publishers (included in the latter group is the Greek code, which has been adopted by the members of Editorial Boards of Athens Dailies). Three codes have only been approved and adopted by publishers, and three by press councils.

which is dated October 1990. There is no code of ethics either in Rumania or in Albania.

Finally, in the third group of Eastern European countries, the "Yugoslav Journalists' Code" is from 1988. It has been adopted by the Federation of Yugoslav Journalists. The Soviet "Code of Professional Ethics" has been adopted by the USSR Union of Journalists, and it dates from April 1991.

2.4. Classification scheme

1. Truth

This category includes all references to the truthfulness, accuracy and honesty of communication. In addition, it includes all rules applying to balanced and neutral writing, the distinguishing between news/facts and commentary, and the correspondence of title and caption with the text. According to Pertti Hemánus, objectivity, in the end-product of journalistic work, consists in truthful reporting which does not omit anything essential to the events and processes concerned (Hemánus 1986, 179). In the present classification the category of objectivity means simply that the text makes explicit reference to the word objectivity or some other comparable phrase — regardless of whether it corresponds in content with the above definition. Finally, the right to correct inaccurate or incorrect information is also classified under "truth".

a) truth, correct information, not false, accurate, honesty
b) essentiality, comprehensiveness
c) unbiased, not distorted
d) objectivity
e) balanced, neutral
f) title, caption
g) critical attitude towards sources
h) facts/news and comment/opinion
i) right to correction

2. Acquisition of information, checking the facts

This category includes rules and guidelines pertaining to the acquisition of information, making oneself known as a journalist, respect for the rights of those providing interviews, and checking the facts of the story.

a) open and honest means, make oneself known as a journalist, rights of those providing information or interviews
b) checking the facts

3. Confidential sources of information, professional secrecy

The right and obligation not to disclose the identity of a confidenial source of information.

4. Freedom of information

5. Journalist and the public

The journalist's obligations with regard to the general public, the journalist in the service of the public.

6. Rights and duties of a journalist

Journalist's right to belong to a trade union or professional associations. The right to refuse assignments that are against the journalist's convictions and conscience and to abide by the ethical rules of the profession. Journalist's rights vis-à-vis his or her employer and other mass media. Journalist's behaviour in relation to colleagues.

a) right to belong to a trade union, working conditions, professional associations
b) conscience, professional associations
c) journalist's rights and obligations with regard to his/her employer and other possible employers
d) relationship to colleagues

7. Professional integrity of a journalist

A journalist must not accept bribes or allow the content of reporting to be influenced by personal advantage or personal interests.

8. Outside influence

The content of reporting must not be influenced from the outside by business interests, organizations and associations, or by any private or state interference based on political or commercial motives.

9. Prevention of textual advertising

10. Copyright, plagiation, respect for other's work, quoting

11. Protection of the individual —his/her human rights

In this category are included all rules and regulations concerning the rights of the individual (i.e. the individual who has been interviewed, whose picture has been taken, whom the story concerns, etc.) as recognized in different declarations and agreements on human rights. Journalistic rights and the corresponding human rights do not of course exactly coincide, but the aim has been to identify rights protected by journalistic ethics which correspond as far as possible with certain human rights. The main concern is to find out how certain human rights are understood and interpreted in the context of journalistic ethics and how they have been applied in that context.

a) right to privacy
b) protection of human dignity, honour and reputation, libel, slander, right to reply
c) question of guilt, mentioning of name, other rules concerning the protection of an individual in legal matters

12. Prohibition of racial, religious, etc. discrimination

13. Human rights

Rules and guidelines calling for respect for human rights in general or for a specific human right not mentioned in the foregoing.

a) respect for and/or duty to promote human rights
b) other specific human right

14. Prohibition of war propaganda

15. Values

Values not mentioned in the foregoing, e.g. respect for democracy and the promotion of peace and international understanding.

a) justice, social justice
b) democracy
c) socialism
d) other social value
e) peace

f) development
g) other specific universal value

16. Material not to be published

a) moral
b) obscenity
c) unnecessary description of violence, glorification of violence
d) national security
e) other

17. Other rules

a) journalist's behaviour and manners
b) others

3. Journalistic Codes of Ethics in the CSCE Countries: An Examination

Using the classification scheme presented in the previous chapter, the CSCE countries' journalistic codes of ethics are here classified into 17 categories, some of which include a number of subcategories. Our aim is to find out which issues are covered by the codes and how they differ from each other.

The basic strategy of analysis is to break down the codes into as small units as possible; these are then slotted into their respective categories (with one analytical unit usually slotted into no more than one category). Where necessary the codes are analysed down into single words. One rule may be placed into different subcategories.

For example, item I(2) in the Swedish code reads as follows: "2. Be critical of news sources. Check facts as carefully as possible even if they have been published earlier. Give the reader/listener/viewer the possibility of distinguishing between statement of fact and a commentary."

This item, in its entirety, is classified under category 1 (truth). The first two sentences belong to category 1g (critical attitude towards sources), whereas the two latter belong to category 1h (fact/news and commentary).

In many cases a certain item or article in a code constitutes in itself a distinct unit of analysis that is classified under one category, but sometimes even individual sentences have had to be split up into different categories. The French code (II) serves as an example: "A journalist worthy of the name considers the slander, unfounded accusation, alteration of documents, distortion of facts, and lying to be the most serious professional misconduct."

In this item we find the words "slander, unfounded accusations", which are placed under category 11b (honour and reputation, etc.). On the other hand, the "alteration of documents and distortion of facts" is placed under category 1c (unbiased).

In cases where there have been major difficulties in interpretation, these are separately discussed in the text under the respective classification.

Rules classified under category 1e (objectivity) include only those that make direct reference to this or a comparable expression.

For brevity, we shall refer to the French "Charter of the Professional Duties of French Journalists" as France (I) and to the "Declaration of Ethical Principles of the Journalistic Profession" as France (II).

3.1. Truth

References to this category are summarized in Table 2.

1a) Truth, correct information, not false, accurate, honesty

According to the Finnish "Guidelines for Good Journalistic Practice", the journalist must aim at truthful communication in his work. This also applies to pictures and sound. The introduction further requires that the information given by the journalist be correct.

The Swedish "Code of Conduct for Press, Radio and Television" emphasizes that news must be accurate. The Norwegian "Code of Ethics" makes no reference to rules belonging to this category. The Danish "Rules of Good Journalism" stress that freedom of speech in closely linked with free access of the press to gathering information and their most correct publication. The task of the press is to provide correct and on-the-spot information.

The Dutch "Declaration of Principles on the Conduct of Journalists" (which, as we saw earlier, is the same as the code adopted by the IFJ) says that the journalist's first duty is respect for truth. The Belgian "Code of Journalistic Principles" contains no references to this category.

The British/Irish "Code of Professional Conduct" says that the journalist shall strive to ensure that the information he/she disseminates is fair and accurate. The expression "fair" implies honesty, sometimes impartiality.

The Italian "Principles of Professional Ethics" reminds that the requirements of truth must always be scrupulously observed. The Austrian "Principles Governing Journalistic Work. Code of Ethics for the Austrian Press" requires in

Table 2
References under the category of truth in the codes of ethics of the CSCE countries

	Subcategory									
Country	1a	1b	1c	1d	1e	1f	1g	1h	1i	T
Denmark	x			x	x	x	x	x	x	7
Finland	x	x	x			x	x	x	x	7
Iceland							x			1
Norway		x	x			x	x	x	x	6
Sweden	x		x			x	x	x	x	6
Austria	x		x							2
Belgium			x					x	x	3
FRG	x		x				x		x	4
France I	x		x							2
France II	x	x	x							3
Greece	x									1
Italy	x	x	x	x					x	5
Netherlands	x		x				x		x	4
Portugal	x		x			x	x	x	x	6
Switzerland	x	x	x				x		x	5
Turkey			x				x		x	3
UK/Ireland	x		x					x	x	4
Canada	x			x			x			3
USA	x	x	x	x	x	x		x	x	8
Bulgaria	x		x					x		3
Hungary	x	x	x				x		x	5
Poland	x								x	2
Soviet Union	x	x	x	x			x		x	6
Yugoslavia	x	x		x			x			4
Total	20	9	18	6	2	6	14	9	16	

Every CSCE code makes some reference to the truthfulness of information. The United States has the most comprehensive code in this regard: it mentions all other aspects of truthfulness except critical attitude towards sources. On the whole, truthfulness is covered most comprehensively in the Nordic codes, although the Icelandic code refers only to one aspect. By subcategories, the highest frequency of references is found for truth, unbiased, and right to correction.

Subcategories: 1a: truth, correct information, not false, accurate, honesty; 1b: essentiality, comprehensiveness; 1c: unbiased, not distorted; 1d: objectivity; 1e: balanced, neutral; 1f: title, caption; 1g: critical attitude towards sources; 1h: facts/news and comment/opinion; 1i: right to correction.

its introduction that all those who are entrusted with the task of providing information and commentaries on topical events to be always conscious of their commitment to truthfulness and correctitude. The first principle of the code states that conscience and correctitude in investigations and reporting is the "journalist's supreme commitment".

The Greek "Ethical Morals" emphasizes that truth and its presentation is the main motive of journalists.

The Portuguese "Deontology Code of Journalists" emphasizes in its introduction that the journalist exercising his freedom of speech must be fully aware of the moral responsibility he is vested with: that of telling the truth in expounding, developing and interpreting facts. In the text proper, it is stressed that the journalist must reject lies.

The French (I) "Charter of the Professional Duties of French Journalists" states that a journalist worthy of this name considers lying to be the most serious professional misconduct. The French (II) "Declaration of Ethical Principles of the Journalistic Profession" also condemns lying. The journalists and newspaper directors must do their best to provide only truthful information to the public.

The FRG "Journalistic Principles (Press Codex)" say that the highest commandment of the press is respect for truth and the truthful informing of the public. If symbolic pictures are used, the captions must make it clear that these are not used as documentary evidence.

According to the Swiss "Declaration of Duties and Rights of Journalists", the journalist must follow the truth regardless of the consequences arising from it.

The Canadian "Charter of Professional Integrity" stresses that a good journalist always seeks to acquire exact information and to ensure the dissemination of facts.

The American "Sigma Delta Chi" code reminds that the journalist's first duty is to serve the truth and to work accurately: "Truth is our ultimate goal." There is no excuse for inaccuracies. Partisanship in editorial comment which knowingly departs from the truth violates the spirit of American journalism. The Sigma Delta Chi code deals comprehensively with this subcategory, as it does with the whole category of truth.

The "Yugoslav Journalists' Code" emphasizes that truth is the basic principle of the journalist's profession. The journalist is duty-bound to present to the public truthful, complete and verified information.

The Soviet "Code of Professional Ethics" states that it is the journalist's duty to present a truthful picture of reality by supplying accurate and exhaustive information. He shall present facts while preserving their true meaning. Intentional publication of false information is a breach of professional ethics which violates citizens' right to information.

The Polish "Moral Code for Journalists" specifies the penalties for violations of journalistic ethics — the code is a list of professional transgression and their consequences. If a journalist publishes false information and is aware of its mendacity, he shall be withheld of his membership rights for two years or be dismissed from the journalists' association. A less serious transgression is to fail to verify the information, if that leads to the publication of false information.

The Bulgarian "Rules of Journalistic Etiquette" say that the journalist respects the truth regardless of his political beliefs and bias.

The Hungarian "Code of Journalists' Ethics" states in the introduction that the common concern of Hungarian journalists is the purity and authority of journalism. Fairness is one of the basic conditions for the conduct of the journalistic profession. A violation of professional and human fairness can be considered a transgression of journalistic ethics. The journalist must provide reliable information to the public. Under the subheading "Journalists' freedom and responsibility", the Hungarian code further requires that facts must be communicated truthfully. Paragraph 6 ("Other cases of ethical offences") reminds that the journalist will be condemned by a court for violating personal rights or for untrue statements. An ethical offence may also concern an entire editorial board.

The Swedish code forbids the presentation of unauthentic pictures as authentic. This of course touches upon honesty in the sense that an unauthentic picture, according to the Swedish code, must be recognizable as such.

The German code states that when symbolic photos are reproduced the caption must make it clear that in fact no documentary picture is involved. According to the American code it is the journalist's duty to act with fairness. In this connection the word "fairness" refers to "frankness, honesty", perhaps also to "impartiality" — and therefore this rule in the American code could also have been classified under class 1e.

1b) Essentiality, comprehensiveness

The Finnish code points out that nothing essential or relevant to the matter in hand should be omitted. The Norwegian code advises journalists to emphasize substance and to show due consideration in all forms of reporting and especially in court cases.

According to the Italian code, the public has the right to be fully informed. The French code (II) stresses that the journalist must not voluntarily omit any essential aspect. The Swiss code says that the journalist must not supress any essential information. According to the American code, there is no excuse for inaccuracies or lack of thoroughness.

According to the Yugoslav code, the journalist is duty bound to disseminate complete information. The Soviet code says that journalists are required to present reality truthfully by supplying accurate and exhaustive information. Facts must be presented while preserving their true meaning, revealing the most important connections. Soviet journalists are expected to carry out their professional duties in good faith, which requires scrupulous verification of facts and accurate reproduction of items received: it rules out any doctoring of facts, unfounded judgement, invention or fabrication of materials.

According to the Hungarian code, the journalist must disseminate comprehensive information.

1c) Unbiased, not distorted

The Finnish code prohibits the use of pictures and sound in a misleading way and the distortion of their contents by cutting, combining or in any other way. The Swedish code also prohibits falsifying the content of a picture by cutting, arrangements or misleading captions. The Norwegian code recommends that caution be exercised when using pictures out of their original context. The treatment of a photograph or picture in a way that changes its nature and that creates an incorrect impression must be avoided. The use of picture should be subject to the same requirements as to prudence as is the written word.

According to the Dutch principles, "the journalist shall not suppress essential information or falsify documents". The code considers malicious misinterpretation of information a serious violation of journalistic ethics. According to the Belgian code, facts must be collected and reported without bias.

The British/Irish code prohibits the falsification of information by distortion, selection or misrepresentation.

According to the Italian code, facts must be interpreted without bias, and they must be faithfully reported. The Austrian code says it is inadmissible to publish picture material which is known to distort the truth.

According to the French (I) code, a journalist worthy of this name considers the distortion of facts and the alteration of documents to be the most serious professional misconduct. According to the French (II) code, a journalist must not deliberately distort anything.

The German code says that the sense of text or pictures must not be "distorted or misinterpreted during their processing, copying or when the illustrations are being captioned". The documents must be reproduced to the sense of their meaning. The code also requires that reports on court proceedings must be strictly unbiased; articles must not be one-sided. This latter statement could also be classified under category 1f. However, the rule does not require absolute equality. The Swiss code prohibits the alteration of facts and documents.

The introduction of the Turkish "Professional Principles of the Press" reminds that the chief function of journalism is to search for facts and to communicate them to the public without distortion or exaggeration. According to the American code, pictures and TV broadcasts should give an accurate picture of the event and not highlight a minor incident out of context.

According to the Soviet code, facts must be guarded against distortion. The Soviet code rules out any suppression of socially significant information, any distortion of the facts or their mendacious interpretation. Falsifying information in some way, distorting the content of a document, or allowing the alteration of the meaning of a document are in violation of the citizen's right to information.

The Bulgarian code emphasizes that the journalist must not intentionally select facts which throw a biased light on events or phenomena.

The Hungarian code stresses that facts must be disseminated without underhand bias. Distortion and unreasonable exaggeration of the reality violates the freedom of the press; this also applies to preventing anybody from disclosing the reality. It is also wrong to express one's own opinions through the distortion or wrong explanation of one's partner's viewpoints.

1d) Objectivity

As I already pointed out earlier, the category of "objectivity" is not understood here in the way it has been defined by Pertti Hemánus, i.e. at the level of knowledge as truth and essentiality. If it were, then the Finnish code would be a model example. That is, the first article of this code says that as far as the results of journalistic work is concerned, truthfulness and essentiality are the prime object. However, in this analysis objectivity simply means that the word is mentioned in the code.

According to the Danish code, reports on court proceedings must be objective ("objektiv"), although the English translation uses the term "absolutely unbiased". This is in fact the true meaning of the Danish version as well — objectivity is understood to mean absolute impartiality and equality. On the basis of the English-language version, this code could also be classified under category 1e, but I have here decided to go by the original text.

According to the Italian code, the public has the right to be objectively informed.

The Canadian code encourages journalists to objectivity, which means aiming to uncover all the facts connected to a certain situation, including the opinions of the various parties to the conflict and the details of problems. In other words this reference implies not only impartiality but also thoroughness.

According to the American code, objectivity in reporting the news is a goal which serves as the mark of an experienced professional. It is a standard of performance towards which all journalists shall strive: "We honour those who achieve it".

The Yugoslav code stresses the citizens' right to objective information.

The Soviet code has an entire article devoted to objectivity. It says that in the selection, interpretation and assessment of facts, and in the publication of information, journalists shall be guided by the basic interests of people. The journalist must refrain from playing up selfish individual or group interests. They shall assist the mass media in reflecting objectively the pluralism of views and in presenting an undistorted picture of the viewpoints of all the parties involved in a dispute.

The Hungarian code prohibits preventing anyone from presenting the reality in the most objective manner possible.

1e) Balanced, neutral

Under the heading of "objectivity", the Danish code stresses that the journalists should, in reporting on court proceedings, strive for an equally disinterested reportage (kvalitativ ligelik gengivelse) of the two mutually hostile attitudes.

According to the US code, news must be free of opinion and bias and represent all sides of an issue. Taken as a whole, this statement can be interpreted as referring to balanced, neutral reporting.

1f) Title, caption

According to the Finnish "Guidelines for Good Journalistic Practice", the title, caption, newsbill and presentation must be covered by the contents. The Swedish rule is largely similar, referring to newsbill, headings, introduction. The Norwegian code says journalists must make sure that headlines do not go beyond what is actually being dealt with in the copy. According to the Danish code, headlines and cross-headings should receive full coverage in the articles or radio and TV programmes that they refer to (overskrifter og mellemrubriker, spisesedler).

The Portuguese code says that the journalist must reject to write and publish exaggerating, distorting amd contradicting headlines. The US code states that newspaper headlines should be fully warranted by the contents of the articles.

1g) Critical attitude towards sources

The Finnish code clearly underlines the importance of a critical attitude towards the source of information ("A journalist must view his sources of information critically"). Facts must be checked as carefully as possible, even when they have been published previously. This is particularly important in controversial matters. The Swedish code encourages a critical attitude towards news sources and says that all facts must be checked carefully, including those that have been published earlier. The Norwegian code says that the journalist shall be critical in the choice of sources and check to verify that the information given and statements quoted are correct. The Danish code also says that the journalist's attitude towards sources of information shall be critical, particularly if the statements can be biased by personal interests or an intention to harm.

The Icelandic "Rules of Ethics in Journalism" makes only incidental reference to the truthfulness of information: article 3 discusses discretion and the protection of name. The journalist, according to the Icelandic code, shall look at the information he has received as carefully as possible.

According to the Dutch code, the journalist must base his/her story only on facts "of which he/she knows the origin".

According to the Portuguese code, the journalist must only make mention of a circumstance or phenomenon whose accuracy cannot be immediately evidenced if the public interest obviously compels to do so — and even then he must expressly mention the dubious character of the information.

According to the German code, the authenticity of both textual and pictorial news and reports must be verified as closely as the circumstances allow. All unverified reports, rumours and assumptions must be identified as such. According to the Swiss code, the journalist shall publish only such information and documents the sources of which are well-known to him. If this is not the case, he must clearly mark unconfirmed announcements.

The Turkish code stresses that journalists must do all in their power to make sure that news are verified and validated before publication.

The Canadian code recommends that methods of investigation be multiplied to attain as great certainty and truth as possible.

According to the Hungarian code, it is the journalist's duty to receive facts and data with necessary prudence and control.

The Yugoslav code says that an independent and critical stand with regard to truth is the basic principle of journalism. The Soviet code regards it as a serious breach to publish false information if this is due to the failure of the journalist to check his sources. It is also a serious breach to publish as reliable a story which is based on uncorrobated reports, rumours and assumptions or an unknown source.

1h) Fact/news and comment/opinion

The Finnish code states that the public must be provided with the opportunity to distinguish between facts and opinions and fictional material used to provide background. This principle does not restrict the choice of journalistic style or form. This means that the Finnish code does not exclude, for instance, the mixing of facts and fiction in TV programmes.

The Swedish code also says that the reader, listener or viewer should be given the opportunity to distinguish the statement of fact and a commentary. According to the Norwegian code, this distinction must never remain unclear to the reader (factual information, comments). Similarly, the Danish code requires that a distinction is made between factual information and comment.

The Belgian code requires separation of information and comment, which must be clearly visible. However, this principle must not prevent the journalist from presenting his own opinion or the viewpoints of others.

The British/Irish code says journalists should avoid the presentation of comment and conjecture as established fact. The Portuguese code requires that the journalist shall clearly define and always demand that difference be made between news and commentaries.

According to the US code, sound practice makes a clear distinction between news reports and expressions of opinion. The journalists recognize their responsibility for offering informed analysis, comment and editorial opinion on public events. This, however, requires individuals whose competence, experience and judgements qualify them for it. Special articles devoted to advocacy of a certain issue or the writer's own conclusions and interpretations should be labelled as such.

The Bulgarian journalist does not allow the truthfulness of facts be distorted by his own comment.

1i) Right to correction

The right to correction refers chiefly to the correction of false information and obvious mistakes. On the other hand, the case where someone has come under heavy criticism and is given the right to reply, is discussed under the category of individual's rights (11b).

According to the Finnish code, incorrect information must be immediately corrected either on the journalist's own initiative or when requested by the party concerned. Corrections are to be published without delay in such a manner that it is easily noticed by those who received the original information.

The Swedish code emphasizes that factual errors are to be corrected when necessary. The rules concerning the timing and placing of corrections are similar to those in Finland. According to the Norwegian code, apology for a mistake must follow as soon as possible. The Danish code says that the correction of misleading information must be made on the journalist's initiative and in such a way that it is clearly noticeable to the readers.

According to the Dutch code, "the journalist shall do the utmost to rectify and publish information which is found to be harmfully inaccurate". The Belgian code requires that facts and information proved to be false after publication be corrected without any restriction and prejudice.

The British code states that the journalist shall promptly rectify any harmful inaccuracies and ensure that correction and apologies receive due prominence.

According to the Italian principles of ethics, inaccurate news must be corrected as promptly as possible in order to guide badly-informed opinion towards the truth. According to the Portuguese code, the journalist himself must work to implement and defend rapid rectifications of information pieces that seem to be inaccurate or false. According to the German code, published reports or assertions which later prove to be false, must be corrected in a suitable manner without delay.

According to the Swiss code, it is the responsibility of the journalist to correct every news item he has published if its content proves to be partially or fully false. The Turkish code says that the press respects the right to correction arising from inaccurate information. The American code states that it is the duty of news media to make prompt and complete correction of their errors.

The Soviet code stresses that it is the duty of the journalist to neutralize the impact of his mistake, to publish a denial, to apologize, and to make up for any moral damage sustained. It is a serious breach of professional ethics for a journalist to refuse to publish the true state of affairs or publicly to admit that the information disseminated was partly or wholly untrue. According to the Polish code, the journalist who illegally refuses to publish a correction or otherwise prevents its publication, shall be subject to a penalty ranging from reprimand to the withholding of membership.

The Hungarian code considers it an ethical violation if the journalist postpones, hinders or refuses to publish a correction on the basis of legitimate observations. It is also a breach of professional ethics deliberately to prevent the publication of a court ruling on correction and, in case of publishing a text, to transform the text and add remarks to it.

3.2. Acquisition of information, checking the facts

2a) Open and honest means, make oneself known as a journalist, rights of those providing information or interviews

In the Finnish "Guidelines for Good Journalistic Practice", there is a separate subtitle on the acquisition of information: this section specifies rules which belong to categories 2 and 3. The two first rules (6 and 7) fall under subcategory 2a: they say that information must be acquired openly and by honest means, and exceptional methods of acquiring information and photos can be resorted to only if generally important information cannot be acquired by normal means. The persons providing information or interviews have the right to know how and in what connection their statement is going to be used.

In the Swedish code, the relevant guidelines are given under the heading of obtaining material. It is stated that interviews must not be falsified. Consideration must also be shown to reasonable requests of interviewed persons to know in what way their statement will be published. Special consideration must be shown towards unaccustomed interviewees. Interviewees must also be informed whether the conversation is intended for publication or only for information. Furthermore, the code requires that the journalist adhere to agreed times of releases.

The Norwegian code also requires journalists to show consideration for people who cannot be expected to be aware of the effect that their statements may have, i.e. towards unaccustomed interviewees, for instance. People's emotions, ignorance, and failing power of judgement must never be abused. It must be stated clearly that any statements made by interviewees may be published. The Danish code says that other person's ignorance or confidence should in no case be misused.

According to the Dutch code, only "fair methods" should be used in the acquisition of news and photographs. According to the Belgian code, facts must be collected without bias. The Austrian code requires that conscience and correctitude must also be followed in the collection of news, photographs and other information.

The British/Irish code says that the journalist shall obtain material only by straightforward means. The use of other means can be justified only by overriding consideration of the public interest.

The Portuguese deontology requires the journalist to observe the commitments vis-á-vis information sources without endangering the right to knowledge. The journalist must evidence his identity before making an interview or before any investigation designed to gathering information.

According to the French (I) code, a journalist renounces to invoke an imaginary title or quality or to use disloyal means or anyone's good faith. The French code (II) contains the same provisions.

The German code stresses that dishonest methods shall not be used in the acquisition of information or photographs. If it has been agreed that the informative or background discussion shall remain confidential, that agreement must be complied with in all circumstances. The Swiss code prohibits the use of unfair and dishonest means. According to the Turkish code, information received on the condition of confidentiality must not be published unless public interest makes it urgently necessary. Journalists must avoid methods and means that may adversely affect the reputation of the profession. Publication dates should be respected.

The Canadian code prohibits the use of disloyal means, such as fraud, blackmail, and intimidation in the acquisition of facts or search for truth. Concealing or falsifying one's identity is forbidden unless the circumstances justify this. Journalists no longer practising the profession may not present themselves as journalists.

According to the Yugoslav code, the journalist is duty bound to comply with the ethical code of public appearances and with the culture of dialogue especially in commentaries and polemical texts. He also has the duty to respect the dignity and integrity of the person with whom he is engaged in polemics. This probably means that even in heated arguments the journalist should not lapse into vulgar style but respect his opponent's dignity and rights.

The Soviet code states that the journalist shall not make public information that is not intended for the press. Given the context of this statement — it is mentioned under the subtitle "integrity", which also touches upon confidential sources of information — it can be taken to mean that journalists shall not reveal the sources of confidential information. This interpretation is supported by the later statement that the publication of information intended to be confidential is a breach of professional ethics.

The use of means such as lies, blackmail, provocation or other acts contravening the norms of ethics or law for purposes of information acquisition is also defined as a breach of journalistic ethics.

The Polish code prohibits the use of means contradictory to journalistic ethics and law for purposes of obtaining journalistic ethics.

The Bulgarian code prohibits the use of dishonest means in the collection of information.

The Hungarian code requires journalists to observe the rules of cultured human behaviour towards the communities and people serving as their sources of information or towards participants of a programme, for instance. It is also forbidden to misuse information which is not expressly destined for publication — a requirement that seems quite strange in the light of the Western concept of "investigative journalism". It is wrong to use information without the consent of the person giving it. Furthermore, the interviewee must not be forced to make statements with which that person disagrees. The journalist must not mention opinions or statements of an interviewed person which were not communicated by that person. Similarly, it is wrong to publish a statement given by a person who is unable to judge the seriousness and consequences of that statement.

2b) Checking the facts

The Finnish code says that, if justified, consent should be given to an interviewee's request to check the facts of his statement before publication. However, such checking must not relinquish journalistic authority outside the editorial office.

According to the Soviet code, the journalist violates professional ethics if despite the author's or interviewee's request he fails to show the final text as prepared for publication or makes substantial changes in the text without the consent of the person concerned or despite that person's explicit specific disapproval. This rule seems to imply much more far-reaching restrictions of journalistic freedom than the corresponding Finnish rule, which only applies to facts and which specifically prohibits the transfer of journalistic authority outside the editorial office.

According to the Hungarian code, the journalist abuses the statement he has obtained if in spite of the requests of the person concerned he fails to show the statement to that person or significantly alters the text without the interviewee's permission.

3.3. Confidential sources of information, professional secrecy

The Finnish code states explicitly that a person providing confidential information must be protected. His identity or pseudonym must not be disclosed without permisson.

The Norwegian code requires journalists always to protect the sources of the press. The name of a person who has provided information against a promise of anonymity must never be stated without permission. This also applies in the case of authors writing under a pseudonym. Similarly, the Icelandic code obliges journalists to protect their source.

The Dutch code reminds that the journalist shall observe professional secrecy regarding the source of information obtained in confidence. According to the Belgian code, sources of confidential information must not be revealed without their consent.

The British/Irish code provides that journalists shall protect confidential sources. According to the Italian code, journalists and publishers are duty bound to observe the principles of professional secrecy, and especially to protect the person who has provided confidential information.

The Portuguese deontology insists on absolute professional secrecy; also, journalists must not disclose the identity of their sources. The French (I) code states that the journalist worthy of this name will keep the professional secrecy. The French (II) code emphasizes that secrecy should be kept as regards the sources of information. The person providing confidential information must be protected, unless consent is obtained from that person to publish his or her name. Professional secrecy must be respected unless information has been provided by a person who knew it was untrue and who misused the good faith of the journalist.

The German code stresses that everyone who is in the service of the press must respect professional secrecy, make use of the witness's right to refuse to give witness, and refrain from giving evidence and disclose the source.

According to the Swiss code, the journalist keeps the professional secrecy and does not reveal the sources of confidential information. According to the Turkish code, journalists shall protect the confidentiality of their sources except in circumstances where the source is deliberately trying to mislead the public for personal, political, economic, etc. reasons.

According to the Greek code, the observance of professional secrecy and confidentiality of sources of information are the main duty and right of the ERT-Ltd and its journalists. Protecting confidential sources of information is also mentioned in the US code.

The Yugoslav code requires that, as a general rule, the journalist must make public the source of information, although he also has the right not to disclose the source. In the latter case, however, the journalist shall bear sole responsibility for the data thus published. Contributions published without the author's name or under a pseudonym are regarded as editorial statements.

According to the Soviet code, it is the journalist's duty to keep secret his sources of confidential information. The journalist commits an offence against his professional honour if he hints at the identity of the confidential source — except in cases where the law requires deviation from professional secrecy.

The Polish code says that the journalist who discloses a name mentioned solely for the information of the journalist or editorial office may in extreme cases be expelled from the journalist organization. Professional secrecy can be broken with the consent of the confidential source or if it helps to solve a crime.

According to the Bulgarian code, the journalist does not act to his informers' prejudice. The journalist protects his confidential information sources.

3.4. Freedom of information

This category (as well as that of "truth") would easily warrant a separate study. That, however, would require an indepth analysis of conceptions of freedom of speech in different social systems — which are currently changing quite dramatically especially in the socialist world.

Therefore, within the confines of the present study, we must content ourselves with this rather superficial classification. Included in this category are all references to freedom of speech or information or rights related to freedom of speech, and which do not belong to any other category.

In the Finnish code it is difficult to make a clearcut distinction between categories 4 and 5 (journalist and the public). In any event the code provides that citizens have the right to correct information of general significance. In order to achieve this (as if this goal were subject to the right of citizens), the journalist must have the freedom to acquire and publish information and the right to criticism. Good journalistic practice or professional ethics limits neither the journalist's nor the public's freedom of expression, which includes an effort to encourage discussion and the flow of information — plus responsibility for the principles and policies of communication.

The Norwegian "Code of Ethics" states that freedom of speech and freedom of the press are basic elements of a democracy. A free and independent press is one of the most important institutions in a democratic society. The press protects these rights and cannot yield to any pressure from anybody who might want to prevent the free flow of information, free access to sources and open debate on any matter of importance to society. It is the duty of the press to carry information on what is happening in society and to uncover matters which ought to be subjected to criticism. — The Norwegian code speaks very strongly indeed in favour of freedom of speech.

The introduction to the Swedish code requires that the press, radio and television shall enjoy the greatest possible freedom within the confines of the relevant legislation in order that they can adequately perform their functions of disseminating news and monitoring social life. However, the individual must be guarded against unnecessary publicity.

The Danish code stresses that freedom of speech is closely linked with free access of the press to gathering information and their most correct publication. This also includes the freedom of comment. The Icelandic code refers to journalists' freedom of expression under the section dealing with textual advertising.

According to the Dutch code, the journalist shall at all times defend the principles of freedom in the honest collection and publication of news, and the right of fair comment and criticism.

The Belgian code says that freedom of expression is one of the fundamental rights of man and an important precondition for enlightened public opinion. The Belgian code has been motivated by concerns to preserve the integrity and freedom of the press. According to article 1, freedom of the press is the main safeguard of freedom of expression. Without that freedom, it is not possible to ensure the protection of other basic civil rights. The press must have the right to collect and publish information and comment without any obstacles in order to shape public opinion. The press recognizes and respects the diversity of opinions and defends freedom of publishing different points of view. Thus the Belgian press requires that freedom of speech be enjoyed not only by itself but also by others. According to the ninth article, secrecy of the public and private affairs as defined by the law cannot interfere with freedom of the press.

The Austrian code emphasizes that the newspaper editors, publishers, radio and television institutions and journalists all share the responsibility for freedom of the mass media which is of crucial importance in a democracy. According to the code, freedom of reporting and commenting is an integral part of press freedom.

The British/Irish code expects journalists to defend the principle of the freedom of the press and other media to collect information, to comment and criticize. The journalist shall strive to eliminate distortion, news suppression and censorship.

According to the Italian ethical principles, freedom of information constitutes an inalienable right. This means that every journalist has the freedom to collect news, screen and publish it in accordance with the actual facts.

According to the Portuguese code, freedom of information and freedom of the press are in accordance with man's fundamental right to inform and be informed as declared in the Universal Declaration of Human Rights (19th article — PJ). These, the code continues, are recognized in the Charter of the United Nations as a basic right which the UN charter recognizes as basic human rights. (The UN Charter does not, however, enumerate any individual human rights — PJ) The journalist must demand access to the source of information in order to obtain all elements he considers necessary for the public to be fully informed. The journalist must abstain from writing news if he has been denied access to all the relevant information. The journalist must struggle against censorship and self-censorship by all possible means.

The French (I) code states that a journalist worthy of the name demands the freedom to honestly publish his information. The French (II) code contains a similar provision. Furthermore, it says that freedom of information and of the press is a fundamental right of people and the cornerstone of all the freedoms enshrined in the UN Charter and the Universal Declaration of Human Rights. It is also guaranteed by the French Constitution.

According to the German codex, freedom of the press, which is guaranteed by the Constitution of the Federal Republic, includes the independence and freedom of information, expression of opinion and criticism.

According to the Swiss code, the right to information, to free speech and criticism are basic human rights. This right is regulated by journalists themselves, as exemplified by the code of ethics itself. It is the journalist's duty to defend freedom of information and all the rights derived from this freedom, viz. the right to comment and criticism. Journalists must demand free access to all sources of information and the freedom to publish all the facts that are of public interest. Public or secret information or private affairs can be withheld only in exceptional cases, and only if clear grounds are given for that direction.

The introduction of the Turkish code strongly underlines the importance of freedom of speech. This is quite understandable in a country where this freedom is not always a matter of course. According to the Turkish code, freedom of the press is a precondition for human dignity and democracy in Turkey. The code appeals to journalists' free will to struggle until a permanent article is incorporated in the Constitution which says that no provisions restricting freedom of the press can be enacted. Freedom of the press is an instrument of the public's right to learn the truth. The struggle against all provisions restricting this freedom is a natural precondition for the protection and respect of freedom of the press. On the other hand, Article 2 states that nothing which restricts freedom of the press shall be published.

According to the Greek code, journalists must always and everywhere be granted freedom of expression, free and undisturbed propagation of ideals and news, as well as the right to opposition. Journalists must have free and undisturbed access to sources of information.

According to the US code, the agencies of mass communication act on their Constitutional mandate and freedom to learn and report the facts. Freedom of the press is an inalienable right of people in free society. It carries with it the freedom and the responsibility to discuss, question and challenge actions and statements of the government and the public and private institutions. Journalists uphold the right to speak unpopular opinions and the privilege to agree with the majority.

The Yugoslav code draws upon country's Constitution, which guarantees freedom of the press and the citizens' right to objective, truthful and prompt information about all events at home and abroad. In the pursuit of his profession the journalist respects the principles according to which the mass media of the Yugoslav system of socialist self-government are free, independent and of investigative character. It is the journalist's duty to work for a free flow of information throughout Yugoslavia, as well as for the openness of the mass media and for the freedom and independence of the mass media. The journalist must respect certain (e.g. military) secrets. If he finds that authorities are misusing this duty, the journalist must make it known to the respective body and demand a public inquiry. The journalist has the right to tell the public of cases of illegal or otherwise unsubstantiated reluctance to provide the information required.

The Polish code takes freedom of speech more or less as given; its second chapter is entitled "Transgressions against the Right to Information and to Free Expression of Opinion". These transgressions include the dissemination of false information and the pursuit of personal benefit.

The Hungarian code reminds in its introduction that journalists serve freedom of the press. Article 2(1) states that the journalist's task is a social, public and political one. The journalist is in the service of broadest freedom of the press. It is his duty to inform, express and harmonize different pluralistic interests. The journalist's responsibility follows from this freedom.

Further, the Hungarian code states that irrespective of persons, posts, personal and group interests, they may publish and have the right to freely express their opinions. The journalist must do his utmost for the free transfer of information. Even on the basis of his vocation, the journalist advocates and supports free discussion and open criticism.

According to the Bulgarian code, man has an inalienable right to information, to freedom of speech and criticism. The journalist defends freedom of speech.

3.5. Journalist and the public

According to the Finnish code, good journalistic practice is based on the citizen's right to correct information of general importance, on the basis of which he can form an honest picture of the environment. The journalist's ultimate responsibility for his work is to his public.

The Swedish code emphasizes that the role played by the mass media in society and the confidence of the general public in these media demands accurate and unbiased news. The media must, in other words try to maintain the confidence of the general public — which in turn means that the journalist is responsible to his public.

The Norwegian code contains no direct reference to the public, but it says that it is the duty of the press to protect individuals against injustices or neglect committed by public authorities and private people. The press has a significant role in society in that it carries information, debates and critical comments. Therefore, the press is also responsible for allowing different views to be expressed.

According to the Icelandic code, the journalist must avoid everything that could adversely affect the public's view on journalism. In particular, the journalist must bear in mind the readers' interests and the prestige of the journalistic corporation.

According to the Dutch ethical principles, it is the primary duty of journalists to respect the truth and specifically the right of the public to truth.

The Italian code says that journalism must respect the public's right to be fully and objectively informed regardless of all ulterior interests. Journalists and publishers have a moral duty to strengthen confidence between the press and its readers.

The Portuguese code emphasizes that the journalist must respect the right of the people to be informed and struggle for it. The journalist must maintain the confidence of the public in the sense of the profession's dignity and integrity.

The German codex requires that in the pursuit of their profession, publishers, editors and journalists must recognize their responsibility towards the public and the duty to defend the reputation of the press. According to the Swiss code, the rights and duties of the journalist derive from the public's right to know facts and opinions. The truth must be respected for the right of the public to know the truth. The Austrian code reminds that journalism means bearing responsibility vis-à-vis the public.

As I pointed out earlier in the discussion on freedom of information, the Turkish code defines freedom of the press as an instrument of the public's right to learn the truth. According to this code, journalists should struggle against all restrictions seeking to prevent the realization of this right.

According to the Canadian code, the journalist should continuously and sparing no effort seek to make information available to the public.

Sigma Delta Chi (USA) says it believes that the agencies of mass communication are carriers of public discussion and information. Public enlightenment is the forerunner of justice and the public has the right to know the truth. Journalists must be free of obligation to any interest other than the public's right to know the truth. The journalist's responsibilities to the public are paramount; this is the nature of their profession. Despite the obstacles, the journalist will seek news that serves public interest. He will make constant efforts to assure that public business is conducted in public and that public records are open to public inspection. Good faith with the public is the foundation for all worthy journalism. The journalist should be accountable to the public for his work, and the public ought to be encouraged to voice its grievances against the media. Open dialogue with the public should be fostered. Adherence to the ethical code is intended to preserve the bond of mutual trust and respect between the American journalists and the American people.

According to the Yugoslav code, the journalist shall take an active part in the formation of the public opinion and the collective assessment of issues. It is the citizens' right to have access to truthful information about all domestic and foreign affairs. The journalist's work is open to public criticism and judgement.

Editorial offices must pay serious attention to all relevant propositions and criticisms.

The Soviet ethical code says its purpose is to define the guidelines which journalists should abide by in order not to act against the just interests of those persons who make use of the results of journalistic work. Journalists are responsible for their readers, viewers, listeners, indeed to society as a whole in terms of the content of the published information; for assuring that every Soviet citizen has the right to full and reliable information about all matters concerning public life, as far as they do not concern secret issues as defined by law; and for assuring the citizens' free right to assess social problems.

Further, the Soviet code stresses that journalists must seek to provide the public with sufficient information to form a world-view on a reliable basis — i.e. to form an accurate and coherent idea of current social processes, their origin, essence and significance, and what is going on in the contemporary world.

The Hungarian code refers in its introduction to the journalist as a servant of the public. Article 2(1) additionally states that journalists are in the service of the public. According to article 2(2), journalists must pay great attention to criticism and complaints they receive, which must be handled scrupulously. In other words, the Hungarian code holds that the servant of the public must also accept feedback from his public.

The Bulgarian code states that in addition to freedom of information, the inalienable right of the public to be comprehensively informed lays the basis of the journalistic profession.

3.6. Rights and duties of the journalist

This category with its four subcategories is summarized in Table 3.

6a) The right to belong to a trade union, working conditions, professional associations

The British/Irish code contains a fairly comprehensive discussion of the journalist's trade union rights. The union desires and encourages its members to maintain good quality of work and high standards of conduct. The National Union of Journalists seeks to promote the interests of its membership. According

Table 3

Rights and duties of the journalist

	Subcategory				
Country	6a	6b	6c	6d	Total
Denmark					0
Finland		x			1
Iceland	x	x	x	x	4
Norway		x			1
Sweden		x			1
Austria		x	x		2
Belgium					0
FRG					0
France I	x	x		x	3
France II	x	x			2
Greece					0
Italy			x	x	2
Netherlands					0
Portugal	x	x		x	3
Switzerland	x	x			2
Turkey					0
UK/Ireland	x	x	x		3
Canada		x		x	2
USA					0
Bulgaria		x		x	2
Hungary			x	x	2
Poland	x		x	x	3
Soviet Union	x	x	x	x	4
Yugoslavia	x			x	2
Total	9	13	7	10	

There are nine codes which make reference to trade union rights: 13 recognize the right to conscience; seven discuss the relationship between employer and journalist; and 10 codes stress the importance of good relationships with colleagues.

Subcategories: 6a: right to belong to a trade union, working conditions, professional associations; 6b: conscience, professional associations; 6c: journalist's rights and obligations with regard to his/her employer and other possible employers; 6d: relationship to colleagues.

to the code, conduct detrimental to the journalistic profession may even be punished by expulsion. On the other hand, the union provides guidance and financial support for members who may suffer loss of work for conforming to Union principles. A Union member shall be loyal both towards his/her employer and his/her Union. These need not clash so long as the employer makes no demands for forms of service incompatible with the honour of the profession or with the principle of trade unionism.

According to the Icelandic code, the journalist shall do nothing that may be degrading to his/her trade union organization.

The Portuguese code requires that journalists defend democratic organizations of journalists in editorial offices and especially editorial boards.

The French (I) code states that the journalist recognizes the jurisdiction of his colleagues as the only one which is sovereign in matters of professional honour. This statement could also have been classified under category 6d, but I feel that this applies chiefly to union rights in the sense that only other journalists have the right to assess the actions of a colleague from the ethical point of view. The corresponding rule is also included in the French (II) code.

The Swiss code deals extensively with journlists' trade union rights. In professional matters the journalist adopts the opinion of his colleagues only. On the other hand, he refuses any interference by the state or any other authority. The journalist has the right to refuse every instruction that is in contradiction with the general policy of his publishing company; he has to be informed of this general policy in writing before he takes up employment. A onesided alteration or revocation of that policy represents a breach of that contract. The editorial staff must be consulted before any decision that results in changes in the editorial staff or the whole organization. The journalist has the right to both a collective contract and a personal contract. It must be made clear in the collective agreement that there will be no personal disadvantages due to the journalist's activity in various trade union organizations.

According to the Yugoslav code, the journalist is responsible for his work to his professional organization. A journalist abiding by the code of ethics enjoys the support of his editorial office as well as his professional organization.

According to the Soviet code, it is a breach of journalistic solidarity if the journalist takes advantage of his official position to block the activities of a journalists' organization or to impose restrictions on its autonomy.

According to the Polish code, the journalist must not damage the union by surpassing the extent of his authority or by neglecting his duty. The journalist must not use his position to restrict the autonomy of the journalist organization.

Thus both the Soviet and Polish codes chiefly impose duties upon the union. On the other hand, they also grant certain rights: the superior within an editorial office does not have authority over the local department of the union.

6b) Conscience and professional ethics

According to the Finnish "Guidelines for Good Journalistic Practice", the journalist must not act against his convictions and good journalistic practice. He may refuse assignments which are in conflict with this principle.

The Swedish code reminds of the provision contained in collective agreement according to which the journalist may not be required to write in conflict with his/her own convictions or carry out humiliating assignments. The Norwegian code also states unambiguously that the journalist cannot be ordered to write or do anything that is contrary to his or her own convictions.

The Icelandic code states that the work of the journalist is guided by his/her conviction. However, it does not make explicit reference to the journalist's right to refuse assignments which are in conflict with his conscience.

According to the British code, it is the journalist's duty to maintain the highest ethical and professional standards. The journalist is entitled to exercise a personal conscientious objection to refrain from using exceptional methods of acquiring information. If a journalist is dismissed because of his or her refusal to undertake a task incompatible with the honour and interests of the profession, the union will give him advice and financial support.

According to the Portuguese deontology, the observance of professional commitments must not motivate dismissal or sanctions against the journalist. If the employer does so, he is in violation of the collective agreement.

The French (I) code states that a journalist worthy of this name assumes responsibility of all that he writes. He accepts only such assignments that are compatible with his professional dignity. The French (II) code contains similar provisions. Furthermore, it reminds that the journalist must assume the full responsibility for any piece of information unless he expressly declines this responsibility beforehand. The journalist shall not tolerate that this information is published under his name if it has been distorted.

The Swiss code recognizes the journalist's right to refuse assignments that are in contradiction with the principles of his profession or his conscience. The observance of this principle must not cause any disadvantages to the journalist. The journalist only accepts assignments that are consistent with the present declaration of the journalist's duties.

According to the Austrian code, journalism means bearing responsibility vis-á-vis one's own conscience.

The Canadian code says that the journalist must assume moral responsibility for his work, and he must not accept or require others to accept assignments which are not worthy of his professional dignity.

According to the Soviet code, the journalist has the right to refuse assignments which are in conflict with his ethical convictions, provisions of the present code, and public morals.

The Bulgarian code provides that the journalist shall not accept assignments which are incompatible with his professional dignity.

6c) Journalist's rights and duties with regard to his/her employer and other possible employers

The Icelandic journalist shall do nothing that might be degrading for his employing corporation or that otherwise might undermine the interests of his employer.

According to the Italian code, journalists and publishers have the duty to co-operate loyally. The British code states that members of the trade union shall show loyalty towards the employer.

According to the Austrian code, the journalist is responsible for the respective medium.

The Polish code states that the journalist may anonymously publicize items for a fee after fulfilling his journalistic duties and always with the consent of his editor-in-chief.

The Soviet code prohibits journalists from presenting the same material to several editorial offices without informing the publishers. Also, material that has been published earlier must not be offered as new.

The Hungarian code prohibits giving a story simultaneously to two or more editorial boards. It is also against professional ethics to submit material that has been published earlier without informing the editorial board that this is the case.

6d) Relationship to colleagues

The Icelandic journalist is required to treat his colleagues in an honest and fair manner.

The Italian ethical principles stress that journalists and publishers have a moral duty to foster the spirit of fellowship between colleagues. According to the Portuguese code, the journalist must refuse to work under conditions which might be conducive to unfair competition. This is fundamentally a reference to journalistic solidarity, but the rule also touches upon item 6c in that the journalist will of course refuse to accept the assignment given by the employer.

According to the French (I) code, the journalist does not claim the position held by another colleague or cause him to be dismissed by offering to work under inferior conditions. The Canadian code contains a similar provision.

According to the Yugoslav code, journalists and their professional organizations cooperate and keep up the reputation, dignity and integrity of the profession, maintain friendly and comradely relations, and maintain professional solidarity.

The Soviet code contains an excessively detailed discussion on the relationships among colleagues. Article 8 deals with professional solidarity and says that journalists shall cherish the integrity and dignity of their colleagues and refrain from action that may damage the prestige of Soviet journalism. Journalists shall not misuse their colleagues' confidence, prevent them from the exercise of their professional duties, or cause them any harm. Instead, they shall help their colleagues develop their creative abilities, enhance their knowledge and professional skills and come to the aid of colleagues in trouble.

However, professional solidarity does not justify attacks on truth or justice. Soviet journalists are in solidarity with their colleagues all over the world, who champion the ideals of peace, humanism, democracy, progress and the great values common to all humanity. In addition, the code contains four paragraphs dealing with breaches against professional solidarity.

Similarly, the Polish code lists several offences against professional solidarity. These include: casting a colleague in a bad light — in the interest of preserving one's own position or obtaining a higher salary or better position; exposing that colleague to the threat of losing his employment; having his wages decreased; and maliciously obstructing the publication of the colleague's work.

The Hungarian code provides that the journalist must not harm the professional and human credibility of a colleague. The editorial supervisor must not pressure his subordinates to distort the truth and obstruct or postpone the disclosing of the reality or prevent the prompt dissemination of information.

The Bulgarian journalist must not in any way impede a colleague to collect information. Nor shall he offer his services on less favourable terms to displace his colleague with unfair competition.

3.7. Professional integrity of a journalist

According to the Finnish code, a journalist must not accept benefits which may compromise his independence or ability to act according to the principles of professional ethics.

The Swedish code prohibits journalists from accepting assignments, invitations, gifts, free trips or other benefits outside their duties which may bring in question the journalist's free and independent position. The journalist's position must not be used in order to exert pressure for his own or others's gain or to acquire personal benfits. Unpublished news concerning economic conditions, local authorities or private people must not be exploited for one's own or other's gain.

According to the Norwegian code, the editorial staff should not use their position to achieve personal gains. The Icelandic code regards it as a serious offence to accept bribes or to threaten with publishing. Journalists must avoid interference in conflicts of interest by publishing news or writing stories about firms or interest groups to which they are linked to or in which they have private interests.

The Dutch principles prohibit taking bribes in any form in consideration of either publication or suppression.

The Austrian code prohibits gifts and the granting of personal advantages which go beyond the sphere of concrete professional activity. Similarly, personal interests must not be allowed to influence the journalist's work. In the introduction, the code says that journalists shall be conscious of their commitment to integrity.

The Austrian Press Council has prepared a special rule entitled "Guidelines on the 'reception of gifts'" (1985) to clarify the paragraph concerning personal integrity. It specifies the following ethical violations: 1) invitations to press conferences are connected with the reception of vouchers, money and values in money offered by firms; 2) gifts are received at press conferences, trips and presentations or when journalists take part in lotteries; 3) journalists participate in information programmes which are connected with trips or stays paid by the organizers without an editorial need for that; 4) journalists misuse their professional contacts in order to get peculiar favours from institutions, firms, etc.

The British/Irish code prohibits journalists from accepting bribes. The journalist shall not allow any external inducements to influence his/her professional duties.

According to the Greek code, the mission of journalism must not be carried out for private purposes. Journalists do not accept any advantage, payment or promise of payment offered as a countervalue for the limitation of independence of their opinions during the exercise of their profession.

According to the French (I) code, a journalist worthy of this name does not receive money in a public service or private enterprise where his status of journalist, his influence and his relations may be made use of. The journalist does not make use of the freedom of the press with profit-seeking intentions. The French (II) code contains similar provisions.

According to the German code, journalists must pursue their profession to the best of their knowledge and belief, without allowing personal gain or irrelevant motives influence their work. The German code further states that the appropriation and affording of advantages of any kind, which may impair the freedom of a publisher or editor are not compatible with the prestige, independence and task of the press. The acceptance of bribes for publication of news or abstaining from it is dishonest and unprofessional.

According to the Swiss code, the journalist shall not accept advantages or promises which are liable to limit his professional independence and to curb the freedom to express his own opinion. According to the Turkish code, the journalistic profession is a public institution which shall not be used as a vehicle for immoral private pursuits and interests. The Canadian code prohibits the journalist from taking bribes. Gratitudes, gifts or personal advantages shall also be refused if they might influence the independence or free consideration of the journalist. The journalist should not take part in such commercial activity which could be harmful to the free practice of the profession or be in conflict with the aims of the profession.

The US code states that journalists who use their professional status as representatives of the public for selfish or unworthy motives violate a high trust. Journalists may accept nothing of value; gifts, favours, free travel, special treatment or privileges can compromise the integrity of journalists and their employers. For the same reason, the journalist should avoid secondary employment, political involvement, holding public office and service in community organizations. Journalists should take care of their private affairs in a way that protects them from conflicts of interest.

The Yugoslav code prohibits acquisitionism or the publication of information for personal advantage.

According to the Soviet code, the journalist should abstain from advocating for selfish individual or group interests, departmentalism, communalism or narrow administrative interests. Integrity prevents the journalist from using his professional position for advocating his own or his close friends' interests. No misuse of the journalist's position is acceptable. The journalist must not accept any compensation, privilege, advantage or services as compensation for publishing material or abstaining from this. The code lists several breaches — one example is the journalist's refusal to publish an opinion which the journalist disagrees with for selfish, party or group reasons. The discussion in the Soviet code of integrity is very comprehensive.

Numerous breaches and violation of journalistic ethics are also listed in the Polish code. Advocation of personal benefits, blackmail and cryptopublicizing are prohibited.

The Hungarian code prohibits claiming or accepting benefits for oneself as a journalist or for anyone else as compensation for concealing or communicating realities. Journalists misuse their profession if they publish an insult as a public matter in a communication medium to their individual benefit or in their own moral and material interests. It is also misuse when journalists, at a professional organization or other institution, carry out activity incompatible with their professional mission or an activity endangering journalists' independence, and accept, for this purpose, e.g. a second employment, a part-time job or mission.

The Bulgarian code prohibits journalists from abusing their freedom of speech and the opportunities offered by the profession self-interestedly, either to settle personal relationships, to satisfy their own ambitions or benefit themselves, or other individuals and organizations in any form.

3.8. Outside influence

The Finnish code stresses that solutions concerning the contents of communications must be made on journalistic grounds. This authority must not be relinquished outside the editorial office in any form. It is a journalist's right and responsibility to repudiate pressure or persuasion aimed at directing, preventing or limiting communication.

According to the Swedish code, journalistic assignments must not be accepted from outside the editorial office. According to the Norwegian code, editorial offices must safeguard their integrity in order that they may be free to act independently of any persons or groups which might want to influence editorial matters. The members of the editorial staff may only accept orders for assignments from the editorial office.

The Dutch code emphasizes that in professional matters, the journalist shall only listen to the law and his colleagues. He must reject every kind of interference by governments or others. According to the Belgian code, newspapers and journalists must not give in pressure. According to the Austrian code, all attempts to influence the content and form of information are inadmissible. Intervention and pressure as well as bribes, which are dealt with under category 7, are among such attempts of pressure which must be rejected.

According to the Portuguese code, journalists must reject any interventions whether at home or abroad and regardless of whether the intervention was made by a government or any other instance. According to the German code, the responsibility of the press towards the public requires that individual or corporate interests of a third party shall not influence editorial publications. Both publishers and journalists must refuse any such attempts.

The Swiss code says that the ethical code is a precondition for the independence and dignity of the profession. The journalist may only accept assignments from responsible members of his editorial staff.

According to the Greek code, the journalist must reject pressure whose purpose is to disclose or distort the truth.

Under its section on textual advertising, the Hungarian code states that journalists may neither on a commission or an editorial board nor in the framework of their employment be forced to participate in PR tasks or tasks with advertising nature.

3.9. Prevention of textual advertising

The Finnish code requires that textual advertising be prevented. The boundary between editorial and other material, e.g. that intended for commercial purposes, must be kept clear.

Third section of the Swedish code is devoted exclusively to editorial publicity. The main rule is the protection of the integrity of the press and the media. Therefore all material that does not have news value or that is not motivated by entertainment or artistic reasons, but mostly has an advertising purpose, must be dismissed. In providing information on products, impartial information must be separated from the journalist's personal values. Information on coming events must be journalistically motivated. The code prohibits journalists from accepting gifts. Where the names of sponsors or donators are mentioned, strong journalistic reasons must be applied — journalistic criteria are the main thread that runs through the entire section on textual advertising. The Swedish code also says that caution must be taken in publishing public notices on editorial pages — only important information, such as doctors on call etc. should be published. All in all the Swedish code is extremely detailed on this aspect.

The Norwegian code requires that a clear distinction be made between advertisements and editorial copy. Advertisements intended to imitate or utilize an editorial product should be turned away, as should those capable of damaging trust in the editorial integrity of the medium. Editorial favours should never be promised in return for advertisements. The basic principle is that the material published is the result of editorial considerations. The Danish code also requires that a clear-cut line should be drawn between advertisement and the edited text. Commercial material should be chosen by a clear journalistic criterion.

According to the Icelandic code, journalists must avoid mixing editorial materials with advertisements either in the form of pictures or texts. This rule does not restrict journalists' freedom of expression if they are writing regular columns under their full name, e.g. reviews in which the personal views of the writer are dominant.

According to the Belgian code, advertisements must be presented so way that any confusion with information may be avoided.

The British/Irish code says that the journalist shall not lend him/herself to the distortion or suppression of the truth because of advertising or other considerations. A journalist, the code continues, shall not by way of statement, voice or appearance endorse by advertisement any commercial product or service for the promotion of his/her own work or of the medium by which he/she is employed.

The French (I) code prohibits the journalist from signing any commercial or financial advertising. The German code stresses that publishers, editors and journalists must make clear the difference between editorial text and advertisements. Advertising texts, photographs and drawings must be clearly separated.

The Swiss code provides that the journalist shall avoid commercial publicity. Also, he must not accept any conditions on the part of the advertizers.

According to the Turkish code, paid announcements and advertisements must be presented in such a way that there is no doubt about their true nature.

The Canadian code prohibits the journalist from guaranteeing with his signature a text the insertion of which is paid. While pursuing his/her profession, the journalist must not accept publicity undertakings. The US code prohibits the publication of "so-called news" coming from private sources unless their news value is made explicit.

The Soviet code regards it as an offence against the citizens' right to information if a journalist publishes sales promotional reports without making clear their commercial nature. A journalist is in violation of his professional honour if he makes himself guilty of covert advertising.

The Polish code prohibits the publication of materials with advertising nature without making this clear to the audience. A journalist must not participate in product-testing.

According to the Hungarian code, it is immoral openly or under the pretext of informing objectively to praise certain products or services or to refer to them regularly even if the gain received were only indirect. On the other hand, voluntary direct or indirect participation in advertising on a commission or in the framework of their employment is not prohibited. However, journalists must make clear to their readers, viewers or listeners the advertising nature of their activity.

The Bulgarian code prohibits the inappropriate use of the journalist's name or job for advertising or for commercial aims.

3.10. Copyright, plagiation, respect for others' work, quoting

The Finnish "Guidelines for Good Journalistic Practice" require that good practice be observed when using the work of some other party. When quoting a work the source must be mentioned. This is also advisable when mainly using facts acquired by a second party.

The Swedish code requires journalists to observe copyright and quotation rules. The source must be mentioned, when the published material mainly is a reproduction.

The Dutch code prohibits plagiarism. According to the Portuguese code, the journalist must reject plagiarism. The journalist has the right to sign his works — his name must not be attached to a story without his permission. The French (I) code states that a journalist shall not commit any plagiarism. The French (II) code stresses that a journalist abstains from plagiarism and states the names of his colleagues whose texts he reproduces. The Swiss code prohibits plagiarism.

According to the Turkish code, a media product generated by a medium of communication shall not be presented to the public by another medium of communication as its own, until it has completed its distribution process. Special attention must be paid to mentioning the source of material coming from news agencies.

The Canadian code prohibits plagiarism. According to the US code, plagiarism is dishonest and unsuitable.

According to the Yugoslav code, the journalist must respect authorship. Treatment of the text in such a way which would distort the author's ideas and thus deviate from the truth and thoroughness, is not acceptable. Every change requires the author's consent. In the event of disagreements, the author has the right to withdraw his article and signature. Plagiarism is incompatible with the professional code of ethics.

According to the Soviet code, a journalist must respect other's copyright and abstain from pseudo-authorship. This means that the journalist must not mislead the public by presenting a letter prepared by himself as an opinion of a reader, a real person. The journalist must not without the author's consent alter a letter submitted by a reader, viewer or listener. Another person's work must not be presented as fully or partially one's own. When using another person's ideas or original themes, the source must be mentioned.

According to the Polish code, it is a punishable act to claim another person's journalistic, artistic or scientific work or parts of it to be one's own or to distort another person's work. It is wrong to alter or deform another person's ideas, evidence, the content of his publication or some information without the consent of the duly authorized person.

The Hungarian code requires that journalists respect copyright and publishing right — including those attached to them. It is violation of copyright to publish or attempt to publish another person's work as one's own. Another person's work must not be quoted in such a way that the original meaning of the text is altered. The source of a quotation must be mentioned. A well-known original topic of another person must not be claimed to be one's own, but the source must be mentioned. In a sense, the rule saying that a junior journalist must use another name or abbreviation to distinguish himself from another, senior journalist also falls under this category of copyright rules. On the other hand, this could also be classified under subcategory 6d (relationship to colleagues).

The Bulgarian code emphasizes that the journalist shall not plagiarize but quotes the author.

3.11. Protection of the individual — his/her human rights

This aspect is summarized in Table 4.

11a) Right to privacy

The Finnish code prohibits the publication of matters relating to a person's private life and detrimental to the party concerned without the consent of the person — unless required by considerable public interest. Protection of private life must also be taken into consideration when old crimes are dealt with, even when there are social, historical or other corresponding reasons for their treatment. Protection of privacy also applies to documents and sources. Public availability of information does not always imply that it can be freely published.

The Swedish code calls upon journalists to refrain from publicity that can constitute an infringement of privacy, unless an undeniable public interest demands publication. Consideration must be given before publishing family disputes and details of custody cases, because these can cause harm to the people concerned. Great caution shall be shown in the publication of notices of suicide

Table 4
The individual's (human) rights in the journalistic codes of ethics of the CSCE countries.

	Subcategory			
Country	11a	11b	11c	T
Denmark	x	x	x	3
Finland	x	x	x	3
Iceland		x	x	2
Norway	x	x	x	3
Sweden	x	x	x	3
Austria	x	x	x	3
Belgium	x	x		2
FRG	x	x	x	3
France I		x		1
France II	x	x		2
Greece	x			1
Italy				0
Netherlands		x		1
Portugal	x	x		2
Switzerland	x	x		2
Turkey	x	x	x	3
UK/Ireland	x	x		2
Canada	x	x		2
USA	x	x		2
Bulgaria	x	x	x	3
Hungary		x		1
Poland	x	x	x	3
Soviet Union	x	x	x	3
Yugoslavia	x	x	x	3
Total	19	22	12	

Private life and the individual's reputation/honour are well-protected in the journalistic codes of ethics of the CSCE countries; so much so that this is a general, universal rule. On the other hand, only half of the codes deal with the rights of accused persons. The only code that contains no reference to the individual's rights is the Italian one.

Subcategories: 11a: right to privacy; 11b: protection of human dignity, honour and reputation, libel, slander, right to reply; 11c: question of guilt, mentioning of name, other rules concerning the protection of an individual in legal matters.

and attempted suicide, particularly for the sake of relatives, and to avoid infringement of privacy.

The Norwegian code advises to exercise caution in disclosing a child's identity in connection with family disputes or in cases involving child care authorities. As a rule, suicide and attempted suicide should never be given any mention. According to the Danish code, the peace of an individual's private life must be respected unless a clearly defined public interest requires publication. Suicide or suicidal attempts must not be made public if not otherwise required by public interest. In case of publication the mention should be worded as carefully as possible.

The Belgian code requires journalists to respect a person's private life. Further, they must avoid intrusion into people's physical and moral sufferings unless otherwise required by public interest.

According to the British/Irish code, a journalist shall do nothing which entails intrusion into private grief and distress — except with overriding consideration of public interest.

According to the Austrian code, journalists reporting on matters relating to the intimate sphere should take into consideration that the public's need for information is contrary to the individual's need to protect his private life.

The Greek code emphasizes that family life and private life are sacred and inviolable. The Portuguese code prohibits interference into the private life of any citizen unless it is publicly echoed or such practices are dictated by a relevant reason of public interest. The French (II) code states that a journalist must respect the private life of all individuals.

According to the German codex, the press shall respect people's private life and intimacy. If private behaviour has an influence on public interest, then that may be discussed in the press. In this case it is important to ascertain that no personal rights are violated by this kind of publicity.

The Swiss code requires journalists to respect the privacy of the individual, if not otherwise required by public interest.

The Turkish code emphasizes that private lives or individuals shall not be reported except where this is necessary for public interest.

The Canadian code prohibits uncovering facts of a personal nature, except if public interest so requires. According to the US code, the agencies of mass communication must be careful not to interfere in a person's right to privacy.

The Yugoslav code requires journalists to protect people's individuality and privacy instead of seeking sensation.

The Soviet code emphasizes that the journalist must avoid interference in people's personal lives. The code prohibits unauthorized interference in a person's private life, except if publicity is necessary for the protection of the interests of society, or citizens' rights and legitimate interests, or if the story is directly related to that person's public activities.

The Polish code prohibits the publication of photographs and information on people's private life without permission, unless publicity is necessary for the interests of society or unless the issue concerns the public activity of the person in question.

The Bulgarian code prohibits violations of the right to personal secrecy, except if the matter is of special interest to society.

11b) Protection of human dignity, honour and reputation, libel, slander, right to reply

According to the Finnish code, the individual's human dignity and reputation must be protected. Negative aspects or outdated matters not directly connected with the matter must not be published unless they are necessary for background information. Special care must be taken when publishing pictures of people. Pictures must not be used misleadingly or in a way that might be offensive to the party concerned. Special consideration must be taken in publishing pictures of accidents or victims of crime. The Finnish code gives the right to reply — however, this is not automatically justified in cases of political assessment, cultural criticism or expression of opinion. The reply must be published without delay and in a way that it is easily noticeable. If the reply is not fit for publication as such, the writer of the reply must be consulted as to its correction. The Finnish code grants a person who has come under heavy criticism the right to reply in the same connection — this is good journalistic practice.

The Swedish code is also fairly comprehensive in its treatment of this aspect. The code grants the right to reply for legitimate reasons. The reply must be published in appropriate form, without delay and in such a way that it will be noticed by those who have received the original information. Editorial comment is not always called for. Pictures that may offend or injure must be avoided. Journalists must be especially considerate to victims of crime and accidents. The Swedish code also recommends that persons who have come under heavy criticism be given the opportunity to reply at the same time. The code recommends that the greatest caution be observed in matters of reports to the authorities, such as the consumer ombudsman or the parliamentary ombudsman, because sometimes the only purpose of these reports is to cause the reported person injury.

The Norwegian code says that space shall be made available for responses from persons and institutions who or which have been made the subject of attacks. Such responses should never be accompanied by an editorial line, but any response should be within reasonable limits as to size, be pertinent to the matter, and seemly in its form.

The Danish code stresses that the publication of harmful, offensive or disreputable information must be considered carefully. The truthfulness of the information must be checked particularly by submitting it to the individual concerned. Attacks and replies to these attacks should, if possible, be published in the same connection. The individual has the right to protection of his personal dignity. Highest consideration must be shown to victims of crime and accidents, as well as to witnesses and relatives.

According to the Icelandic code, journalists shall react thoughtfully to sensitive issues. They shall avoid everything that can cause unnecessary pain or disgrace and dishonour to innocent people or to those who have fallen victim to an accident. Slander is apparently also prohibited, because the word "slanderous" appears in the sixth paragraph as the second but least serious offence.

The Dutch code condemns calumny, slander, libel, and unfounded accusations. According to the Belgian code, the individual's dignity must be respected. The code also mentions the right to reply. According to the British code, the right to reply must be granted when the issue is of sufficient importance.

The Austrian code stresses that personal defamation, slanders and derision constitute a misuse of freedom of reporting and infringe upon journalistic ethics. The publication of defamatory picture material is mentioned separately.

According to the Portuguese code, a journalist should abstain from unfounded accusations and slanders and defend the right to reply. According to both French (I and II) codes, slander and unfounded accusations are serious professional offences. According to the French (II) code, those who face accusations harming their morality or reputation shall have the right to reply in accordance with the existing laws.

According to the German code, it contradicts journalistic decency to publish unfounded accusations, especially those insulting someone's honour. The Swiss code states that the journalist shall disregard anonymous and unfounded accusations.

The Turkish code prohibits publishing anything that humiliates, ridicules or defames private or public persons beyond the limits of fair criticism. The press respects the right to reply.

The Canadian code says the journalist shall bear in mind that defamation and accusations without proof are serious professional offences. According to the US code, the mass media should not present unofficial charges affecting reputation or moral character without giving the accused person a chance to reply. Journalists shall always show respect for the dignity, rights and well-being of people encountered in the course of gathering and presenting the news.

The Yugoslav code encourages journalists to show special consideration with stories dealing with disasters, family tragedies, diseases, information about children and juniors.

The Soviet code requires that respect be shown for people's honour and dignity. Unverified information or rumours shall not be disseminated, and expressions damaging a person's reputation or honour must not be used. Offences of professional ethics include unfounded refusal from an answer to criticism or a denial, libel or insult, making public a person's physical or mental deficiencies, ridiculing a person's surname or name, and publishing news that in itself is true but that is socially insignificant and that may damage a person's integrity and dignity.

According to the Polish code, the journalist shall not refuse publication of answer. Slander, defamation and libellous statements as well as contempt of people's physical or mental attributes are offences against professional ethics.

The introduction of the Hungarian code states that an offence against honour is one of the areas covered by journalistic ethics. The code encourages journalists to be cautious in matters touching upon the individual's rights. Journalists must show respect for human dignity and the good name of both private and legal persons.

The journalist is in violation of the individual's dignity and rights if he/she claims or propagates lies harmful to his/her reputation and honour or uses abusive words. People must not be condemned, be it without mentioning his/her name or under a pseudonym, if the identity of the person concerned is clear. It is wrong to use one-sided information to try to influence unfinished matters or to cause material or moral damage in this way to anyone involved in the matter concerned.

It is wrong to present that person in a report or use his/her expression in such a context or in photos that they harm his/her reputation or affect his/her rights. In discussion in the press it is unsuitable and uncivilized to present replies coarsely, dishonestly and in an inappropriate manner. Criticism or answers must not include abusive, unfounded and malicious remarks unrelated to the topic. Of course, it can be stated that an ethical offence has taken place if the court sentences the journalist or the editorial office for an offence of personal rights.

According to the Bulgarian code, the journalist does not object but rather assists the party affected by him to realize his right to reply in the same place or the same programme hour — a rather powerful definition of the right to reply. The journalist does not use qualifications derogatory to human dignity. He does not take advantage of people's frankness or sufferings in his articles.

11c) Question of guilt, mentioning of name, other rules concerning the protection of an individual in legal matters

According to the Finnish code, no prior assumptions of guilt must be made. Publication of information concerning reports of offences, arrests, imprisonment, charges or complaints must be carefully considered. The grounds for these actions must be made known as well as possible in this connection. It is good journalistic practice to follow the proceedings to the final resolution. The publication of name or other information leading to the identification of a person is justified only if this is required by considerable public interest. Usually identities must not be disclosed before court proceedings unless there is good cause for it. Old crimes not relevant to the matter being dealt with must not be published.

The Swedish code is also thorough on this point. Reports on crime must not be published before first finding out if there are grounds for such a report. No irrelevant facts must be mentioned about people mentioned in connection with a crime. The decision of the court or comparable authorities must not be anticipated by taking sides in the question of liability. The points of view of both parties must be presented. The case should be followed to the end and the decision should also be reported. The publication of names should be refrained from unless an obvious public interest requires. If names are not published, other particulars making possible the identification of the person concerned should not be published. Previous sentences should not be mentioned unless there are very good reasons for doing this. The Swedish code encourages criticism in describing the particulars of people wanted by the police. Further, the code reminds that responsibility for the publication of names and pictures lies with the publisher.

According to the Norwegian code, journalists should exercise caution in reporting on law and crimes. No position shall be taken on the question of guilt before the court has issued a duly enforceable decision. Reports, accusations, charges, etc. should not be regarded as a truth before the court sentence. Consideration should be shown with the publication of names, pictures and other items of definite identification — especially with cases still being investigated and in the case of young offenders. Names must not be published if not necessary to meet just and fair demands of information.

The Danish code also emphasizes that the report on the trial or lawsuit must be followed by a report on how the trial or the lawsuit has been concluded. Before the final decision, the journalist must not publish information that could hinder or hamper clarification of the case or finding the defendant guilty. The story should also clearly formulate the defendant's plea of guilt or innocence. The name or other information concerning the identity of the person accused or indicated should not be revealed unless required by public interest. As a rule, indictment should not be published until it has led to action by the police or the prosecutor. However, this does not apply to people already widely known and who have long been in the limelight of the public. Indictment may also be published if it is well-founded. Verdicts previously pronounced and sentences passed on the person accused shall not be mentioned unless that evidence is relevent to the case in question. No other journalistic context should contain any mention of the legal proceedings previously taken.

According to the Icelandic code, journalists should give proper consideration to whether citizens' security, general interests or common welfare require the publication of names. In the case of criminal offences and sentences for them, journalists should respect the legal principle according to which all people should be regarded as not guilty until otherwise proven in a court of law.

The German code states that reports on preliminary and legal proceedings pending must be unprejudiced. Therefore the press must abstain from one-sided or partial positions in the accounts before and during such proceedings. In dealing with crimes committed by juvenile offenders, attention must be paid to the person's future, and names and identifiable pictures must not be published, except in case of a serious crime. The court decision shall not be reported before it has been officially announced.

According to the Austrian code, reports on offences perpetrated by youngsters must not make difficult or even prevent their potential integration into society. In such cases, surnames must not be mentioned.

According to the Turkish code, no-one shall be declared guilty before he/she has been tried and convicted by judicial authorities. Criminal offences must not be attributed to individuals without reasonable and persuasive evidence to that effect.

The Yugoslav code states briefly but clearly that in reporting on court cases, the journalist must bear in mind the equality of citizens before the law and that nobody can be seen as guilty before they have been sentenced.

The Soviet code considers it a professional offence to discuss the indicted person's guilt before the court decision or to interfere with the presumption of innocence and independence of judges in some other way. Also, the journalist must not use materials which failed to receive corroboration in the final court decision. Names and pictures of juvenile delinquents must not be published without the consent of the persons in question or their legal representatives. Journalists must not refuse to restore the good name of people who have earlier been accused in the mass media of breaking the law, ethics, or social relations, but who have later proved to be innocent.

The Polish code says that journalists must not take a position on the question of guilt before the court decision. No information, names or pictures must be published of closed court hearings. The legally prescribed or expunged offences of a person mentioned by name must not be published, although it is permissible to deviate from this rule in the defence of the interest of society.

According to the Bulgarian code, the journalist shall not reveal the names of juvenile offenders or victims of a crime.

3.12. Prohibition of racial, religious, etc. discrimination

The Finnish code says that a person's race, nationality, origins, religious or political convictions must not be presented in an uncalled for or derogatory fashion.

The Swedish code requires that journalists do not unnecessarily emphasize the race, descent, nationality, sex, occupation, political affiliation or religious views of the persons concerned.

The Norwegian code calls for respect for a person's identity, privacy, race, nationality or religious belief — personal characteristics must not be unnecessarily emphasized.

The Danish code says that journalists shall avoid mentioning family connections, professions, race, nationality, religious denominations or membership of organizations unless they are directly relevant to the matter concerned. This rule is mentioned under the section dealing with law cases.

According to the Dutch code, journalists shall be aware of the danger of discrimination being furthered by the media, and shall do the utmost to avoid facilitating such discrimination based on, among other things, race, sex, sexual orientation, language, religion, political or other opinions, and national or social origins.

The Belgian code declares that the press opposes all discrimination based on sex, race, nationality, language, religion, ideology, culture, class or conviction provided that the convictions thus professed are not in contradiction with the respect for fundamental human rights.

According to the British/Irish code, the journalist shall not originate or process material which encourages discrimination on the basis of a person's race, colour, creed, illegitimacy, marital status or lack of it, gender or sexual orientation.

According to the Austrian code, the prohibition of personal insult and libel also applies to globally superficial contempt for and slander of persons and groups of persons. All kind of discrimination on the basis of race, religion, nationality or other bases is inadmissible.

The Portuguese code emphasizes that the journalist must never support Fascist ideology, racial, ethnic, national or religious hatred.

The German code stresses that no-one must be discriminated against on the basis that he/she belongs to some ethnic, religious, social or national group. Pictures or articles that may offend the moral convictions or religious feelings of a group are incompatible with the responsibility of the press.

According to the Greek ethical code, the religious convictions, relations, customs of peoples, nations and races are sacred and inviolable.

According to the Turkish code, no-one must be denounced or ridiculed in publications because of his/her race, sex, social position or religious beliefs.

The Soviet code says that the mass media must not be used for promoting ethnic or religious intolerance. They must avoid defence of discrimination. They must encourage their readers to respect the rights and value of nations and peoples regardless of sex, age, race, nationality, language, occupation, domicile or attitude to religion. It is an offence of professional ethics to present people or groups of people in an unfavourable light because of such a characteristic.

The Polish code prohibits contempt of people and groups of people on the basis of their religion, nationality, race, customs or citizenship.

The Hungarian code says that journalists must not stir up hatred among nations, nationalities and religions.

The Bulgarian code requires that the journalist does not allow his works to be instrumental in opposing people by race, ethnicity, religion or class.

3.13. Human rights

13a) Respect for and/or duty to promote human rights

The Finnish "Guidelines for Good Journalistic Practice" remind that professional ethics involves respect for basic human values such as human rights.

The tenth article of the Belgian code is devoted to human rights. It says that journalists should consult the editor if freedom of expression comes into conflict with other fundamental human rights. The editors will decide which right is given priority to.

According to the Portuguese code, the journalist must respect the fundamental principles of human rights and contribute to a better knowledge of and better mutual understanding between peoples.

According to the Yugoslav code, journalists shall work to strengthen dignity and the human rights of citizens. The Soviet code requires that journalists recognize the priority of general human values (including human rights) over all other values. The Hungarian code states that the journalist must not violate human rights.

13b) Other specific human rights

According to the Portuguese code, increasing interaction among nations is based on people's right to self-determination and independence, the principle of non-intervention in internal affairs, equality and mutual advantages and the principle of peaceful coexistence.

The Turkish code prohibits the publication of anything that restricts the freedom of thought or conscience. Writings that may damage the family institution must not be published either.

According to the Yugoslav code, journalists seek to strengthen people's equality under the law. According to the Soviet code, journalists must subordinate their activities, among others, to the elimination of poverty, hunger and disease (other references to universal problems are found under categories 14 and 15). This reference can be interpreted as one to economic, social, and cultural rights. In addition, the code takes an explicit position on nations' right to self-determination, saying that the journalist must treat with respect the characteristics, values, and dignity of national cultures as well as the right of nations to choose freely their political, social and economic systems.

3.14. Prohibition of war propaganda

The Soviet code requires that journalists abstain from justifying aggression, the arms race and other form of violence.

Mass media must not be used for the promotion of war and violence. Instead, journalists must deal in their articles with issues such as the elimination of the threat of nuclear war. Journalists must also help to banish ignorance, misunderstanding and suspicion in international relations and promote civilized interethnic relations and evoke among their readers, listeners and viewers a sensitive attitude to the needs of other people and respect for the rights and dignity of all nations and all people regardless of their sex, race, nationality, religion view or theological conviction. They shall assist in creating a climate of trust in international relations, in easing international tensions and in promoting disarmament and national development. The Soviet code does not only prohibit war propaganda: in addition, it also gives positive obligations.

3.15. Values

This category includes those journalistic values we have not dealt with earlier. By values, we refer here to such things that a good journalist should seek to promote or respect in accordance with the ethical codes. This category also covers general responsibility towards a certain instance or actor, such as the party, a nation, or some other community of people. In this regard this category constitutes a set of values lying behind the ethical code. Table 5 summarizes the subcategories of this class.

15a) Justice, social justice

According to the French (I) code, the journalist respects justice and gives it a top priority. However, the journalist must not confuse his role with a policeman. The French (II) code contains similar statements.

The Greek code holds that the cardinal task of journalists is to support national liberties and social and state relations.

The US code says that journalists who are members of the Sigma Delta Chi organization regard public enlightenment as the forerunner of justice. The purpose of distributing news and enlightened opinion is to serve the general welfare.

According to the Yugoslav code, journalists shall work for a legal state.

15b) Democracy

According to the Finnish code, the journalist's professional ethics involves respect for democracy.

The Italian code says that in a democratic country possessing liberal institutions, it is essential for journalists to cooperate in creating a properly informed public opinion. By this the code is apparently saying that journalism represents "the Fourth Estate" of democracy.

The Greek ethical code regards supporting democratic systems as one of the chief functions of journalism.

According to the Soviet code, the mass media must not be used for manipulating public opinion or for monopolizing glasnost. Journalists must respect certain basic human values, such as democracy.

Table 5

Values in the ethical codes of the CSCE countries

	Subcategory							
Country	15a	15b	15c	15d	15e	15f	15g	T
Denmark								0
Finland		x			x		x	3
Iceland								0
Norway								0
Sweden								0
Austria								0
Belgium								0
FRG								0
France I	x							1
France II	x							1
Greece	x	x		x				3
Italy		x		x				2
Netherlands								0
Portugal				x	x			2
Switzerland								0
Turkey								0
UK/Ireland								0
Canada								0
USA	x							1
Bulgaria								0
Hungary				x				1
Poland								0
Soviet Union		x			x	x	x	4
Yugoslavia	x		x	x	x		x	5
Total	5	4	1	5	4	1	3	

Values are mentioned very rarely in the journalistic codes of ethics. The only codes with frequent references to basic values are the Yugoslav and Soviet codes of ethics. By contrast, Hungary, Poland and Bulgaria appear to be moving towards the Western tradition where no mention is made to values.

Subcategories: 15a: justice, social justice; 15b: democracy; 11c: socialism; 11d: other social value; 11e: peace; 11f: development; 11g: other specific universal value.

15c) Socialism

The Yugoslav code refers in its introduction to the fact that the country's constitution guarantees freedom of the press. It also mentions the programme objectives and statutes of the Socialist Union of the Working People of Yugoslavia, as well as the legislation concerning public information and socialist moral norms. Journalists work for the fulfillment of the constitutional role of the working class and their right to free decisions concerning their life and work, for the consolidation of Yugoslav socialist patriotism, and for the preservation of the country's revolutionary achievements and constitutional arrangement.

15d) Other social value

According to the Italian code, the journalist must reconcile his activities with the respect due to other people, whether individuals or corporate bodies in the exercise of their legitimate functions.

According to the Greek code, respect for accepted and national values and the support of national interests must inspire journalists in their work.

The Portuguese code says that journalists must seek to contribute to the formation of civic consciousness, to the development of culture and critical aptitude of the Portuguese people.

According to the Yugoslav code, journalists must in the pursuit of their profession bear in mind the development of socialist self-government, the inviolability of Yugoslavia's unity and federative system, and the principles of equality of its constituent nations and nationalities. The freedom and investigative nature of mass media is in the interest of public affairs, self-governing democracy, and social progress.

According to the Hungarian code, it is the journalist's duty to respect and preserve the constitutional order of their homeland.

15e) Peace

According to the Finnish code, peace represents a basic human value whose respect is an integral part of journalistic ethics. The Portuguese code encourages journalists to support the principle of peaceful coexistence.

The Yugoslav code reminds journalists that Yugoslav foreign policy is founded on the principles of non-alignment and peaceful coexistence.

The Soviet code recognizes peace as a general human value.

15f) Development

The Soviet code is the only one of those under review that mentions the goal of national development. According to the code, progress is a general human value whose significance must be recognized. Journalists must assist in the process of national development. In particular, it is expected that journalists contribute to the democratization and decolonization of international relations in the sphere of information and to the establishment of a new international information order.

15g) Other specific universal values

The Finnish code recognizes international understanding as a universal human value.

The Yugoslav code reminds that the country's foreign policy is based on the principle of non-alignment. Also, adherence to the principle of freedom is encouraged. Journalistic ethics involves respect for the achievements and progressive values of civilization.

The Soviet code regards humanism as a general human value. The code encourages journalists to promote mutual understanding between peoples and nations. In accordance with the country's new political thinking, journalists must deal with such issues as the elimination of the threat of nuclear war, protecting the environment, protecting historical and cultural monuments, and doing away with such evils as poverty, famine and disease.

3.16. Material not to be published

16a) Moral

The Italian code emphasizes that the publication of a piece of news or comment must never outrage the moral conscience of the public — whatever that might mean in practice. Unhealthy instincts must never be fostered nor must harmful feelings be stimulated or supported.

According to the Portuguese code, the journalist must never incite bad instincts or morbid feelings through ticklish subjects — the moral conscience of the collectivity must be taken into consideration.

Table 6

Regulations on prohibited or otherwise delicate issues

	Subcategories					
Country	16a	16b	16c	16d	16e	T
Denmark						0
Finland						0
Iceland						0
Norway						0
Sweden						0
Austria					x	1
Belgium			x			1
FRG			x		x	2
France I						0
France II						0
Greece						0
Italy	x					1
Netherlands						0
Portugal	x				x	2
Switzerland						0
Turkey	x		x		x	3
UK/Ireland						0
Canada						0
USA						0
Bulgaria						0
Hungary	x					1
Poland						0
Soviet Union		x	x	x	x	4
Yugoslavia				x		1
Total	4	1	4	2	5	

There are very few statements in the journalistic codes of ethics of the CSCE countries that expressly list prohibited or delicate issues.

Subcategories: 16a: moral; 16b: obscenity; 16c: unnecessary description of violence, glorification of violence; 16d: national security; 16e: other.

According to the Turkish code, matters which are damaging or offensive to public morals must not be published.

The Hungarian code prohibits violating public morale.

16b) Obscenity

According to the Soviet code, the mass media must not be used for the dissemination of pornography.

16c) Unnecessary description of violence, glorification of violence

The Belgian code states that crimes and terrorism as well as other cruel and inhuman acts must not be glorified.

The German code says that journalists should abstain from sensational and exaggerating descriptions of violence and brutality. Children underage must be protected.

The Turkish code recommends that such material should not be published which is conducive to violence and use of force.

The Soviet code prohibits the propaganda of cruelty.

16d) National security

According to the Yugoslav code, journalists are subject to legislation on keeping military, official, economic and commercial secrets. Journalists must respect the embargo on the publication of such material.

The Soviet code prohibits the use of the mass media to the detriment of the interests of the Soviet state.

16e) Other

According to the Austrian code, it is a flagrant misuse of freedom of the press to speculate on people's fears with the purpose of gaining financial benefit.

According to the Portuguese code, journalists must reject to deal with any theme designed for propaganda purposes.

According to the German code, articles dealing with medical issues must avoid sensational exaggeration which may raise in the readership unjustified fears or hopes. Preliminary research findings must not be represented as final or almost final.

According to the Turkish code, material offensive to religious sentiments must not be published.

The Soviet code says it is in violation of journalistic ethics to publish disputed or inconclusive results of medical or pharmaceutical studies as significant achievements in the field of health protection and in this way to raise unfounded hopes for a cure among the seriously ill and their families.

3.17. Other rules

Most codes include regulations pertaining to the codes themselves: to their control, to the instance who or which has produced the code, or punishments for offences. However, within the confines of the present study it is not possible to discuss these rules at greater length.

17a) Journalist's behaviour and manners

According to the Icelandic code, all journalists should bear in mind the basic rules of all human relations. Journalists are aware of their personal responsibility for all that they write. They bear in mind that they are also regarded as journalists outside their habitual sphere.

The Greek code defines the journalistic profession as a mission.

The Polish code discredits the journalist by his comportment or activities, or who blemishes the journalists' good name.

The Hungarian code calls for ethical, cultural and responsible behaviour and professional honour. In addition, journalists commit an ethical offence when they either deliberately or unconsciously commit a serious offence. Similarly, it is an ethical offence if independently of the legal consequences journalists behave in such a way as to cause public nuisance harmful to the prestige of the profession, or take part in such activity.

The journalist is responsible for his work regardless of whether it is signed.

17b) Others

The Finnish "Guidelines for Good Journalistic Practice" say that journalists must be familiar with the most common official regulations relating to journalist's work, such as laws, statutes, international agreements and resolutions.

The Norwegian code of ethics reminds that according to the laws of the press, the editor-in-chief bears full personal responsibility for the contents of newspapers and magazines.

Table 7

Summary. Categories 1–17 of the classification scheme.

	Categories																	
Country	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	T
Denmark	●	●		●					●		●	●						6
Finland	●	●	●	●	●	●	●	●	●	●	●	●	●		●		●	15
Iceland	●		●	●	●	●	●		●		●						●	9
Norway	●	●	●	●	●	●	●	●	●		●	●					●	12
Sweden	●	●		●	●	●	●	●	●	●	●	●						10
Austria	●	●		●	●	●	●	●			●	●				●		10
Belgium	●	●	●	●				●	●		●	●	●			●		10
FRG	●	●	●	●	●		●	●	●		●	●				●		11
France I	●	●	●	●		●	●		●	●	●				●			10
France II	●	●	●	●		●	●			●	●				●			9
Greece	●		●	●			●	●			●	●			●		●	9
Italy	●		●	●	●	●									●	●		7
Netherlands	●	●	●	●	●		●	●		●	●	●						10
Portugal	●	●	●	●	●	●		●		●	●	●	●		●	●		13
Switzerland	●	●	●	●	●	●	●	●	●	●	●							11
Turkey	●	●	●	●	●		●		●	●	●	●	●			●		12
UK/Ireland	●	●	●	●		●	●		●		●	●						9
Canada	●	●			●	●	●		●	●	●							8
USA	●		●	●	●		●		●	●	●				●			9
Bulgaria	●	●	●	●	●	●	●		●	●	●	●					●	12
Hungary	●	●		●	●	●	●	●	●	●	●	●	●		●	●	●	15
Poland	●	●	●	●		●	●		●	●	●	●					●	11
Soviet Union	●	●	●		●	●	●		●	●	●	●	●	●	●	●		14
Yugoslavia	●	●	●	●	●	●	●			●	●		●		●	●		12
Total	24	20	19	22	17	17	20	11	17	15	23	16	7	1	10	9	7	

On the basis of this analysis, it seems that Finland, the Soviet Union and Hungary have the most comprehensive codes of journalistic ethics. Denmark and Italy are at the other extreme of the continuum. Truth is clearly the most important value of journalistic ethics in all CSCE countries: it is mentioned in every code under review.

Categories: 1: Truth; 2: Acquisition of information, checking the facts; 3: Confidential sources of information, professional secrecy; 4: Freedom of information; 5: Journalist and the public; 6: Rights and duties of the journalist; 7: Professional integrity of a journalist; 8: Outside influence; 9: Prevention of textual advertising; 10: Copyright, plagiation, respect for others' work, quoting; 11: Protection of the individual — his/her human rights; 12: Prohibition of racial, religious, etc. discrimination; 13: Human rights; 14: Prohibition of war propaganda; 15: Values; 16: Material not to be published; 17: Other rules.

4. Summary

Our content analysis of the CSCE countries' codes of journalistic ethics suggests that the most important principle in all those countries is represented by truth: all 24 codes included in the analysis say that truthfulness of information is a basic premise for the journalistic profession. Truth is the most basic precondition for the credibility of mass communication.

The category of "truth" contained a rather wide variety of different issues, ranging from critical attitudes towards sources through the correction of false information to headlining newspaper articles. The subcategory which occurred most frequently in the ethical codes was the first one (1a), which is concerned with truth, correctness, and accuracy. Twenty of the codes examined make reference to these aspects.

As many as 18 codes emphasize the importance of unbiased reporting (1c), i.e. that the journalist must not report on facts, events, documents, etc. in such a way that this may cause truth to be distorted. The same applies to the use of old or outdated material such as pictures or photographs: these must not be used in a way which may change the content of the original material. In other words, there are actually two basic rules here. A good example of the first rule is provided by the requirement contained in the US code that journalists should not highlight a minor incident out of context — this amounts to distortion of truth. The latter rule, then, is crystallized in the Norwegian code, which forbids the treatment of a picture in a way which changes its nature and creates an incorrect impression.

The purpose of these rules which prohibit misinterpretation is not to deny the publication of stories which focus on details, for instance; the message is that details should always be treated with a view to the purpose of the story. For example: It would be considered a violation of this rule if a reporter highlighted (perhaps on the basis of his or her own prejudices) the only incident in an otherwise peaceful demonstration and made this the headline of the story.

The requirement of correcting false information (1i) is included, in one form or another, in 15 codes.

There are 14 codes which include the requirement of critically evaluating one's sources (1g). For example, the Swedish code cautions journalists to be critical of news sources and to check facts even if they have been published earlier. The code of Yugoslav journalists regards an independent and critical approach to truth as the very basic principle of the profession.

Nine of the codes stress the essentiality of information (1b), and six mention the criterion of objectivity (1d). However, the latter is clearly understood in slightly different ways in different codes. In the Danish code, for example, objectivity means first and foremost equality or impartiality, while in the Canadian code there is also the element of thoroughness. The code of Soviet journalists requires that journalists shall assist the mass media in reflecting objectively the pluralism of views and in presenting an undistorted picture of the viewpoints of all the parties involved in a dispute — i.e. a picture which takes into consideration the relative weight of different opinions.

Nine codes stress the importance of distinguishing between news/facts and commentary (1h): this requirement is contained in all the codes of the Nordic countries (excepting Iceland), Belgium, Portugal, the United Kingdom, the United States and Bulgaria.

Four of the Nordic codes plus the Portuguese and US codes point out that the title and caption of the story should be compatible with the actual copy (1f). This is heavily stressed in the Finnish code, while in the other CSCE countries it figures quite rarely.

Denmark has the only code which refers explicitly to the requirement of impartiality (1e), and even here this is restricted to reporting on law cases. The US code says that all sides of an issue should be represented, which in a broad interpretation can be taken to refer to impartiality.

The US code covers eight of the nine aspects that were here defined as part of truth, more than any other code included in the analysis. It defines truth as the ultimate goal of journalism, as a value above all others. Also, the Sigma Delta Chi code emphasizes that journalism shall serve the public interest.

Truth is also a central requirement in the Soviet code: it contains references to six of the nine different aspects. The Portuguese code also mentions six aspects of truth. Similarly, the Nordic countries consider truth a requirement of paramount importance; in these codes there are references to 6-7 of the subclasses identified. However, the Icelandic code, for one reason or another, hardly deals at all with truth.

Category 2 concerned the acquisition and checking of facts. The general rule in the CSCE countries is roughly as follows: The journalist shall use open and honest means in the acquisition of information, and in normal circumstances shall also present himself or herself as a journalist. Exceptional means of obtaining material may only be used when this is absolutely necessary in order to acquire information which is of importance to society as a whole. The journalist shall show consideration for people who are unaccustomed to being interviewed. It is correct to inform the person who is interviewed how and where his or her statements shall be used.

The US code contains no guidelines concerning means of information acquisition. One possible explanation for this omission lies in the overriding importance of the principle of truth in the United States: perhaps this is why there are no explicit ethical rules on the acquisition of information.

All in all there are 20 references that are classified in category 2. Apart from the US document, the only Western codes that do not deal with the ethical principles of information acquisition are the codes of Italy, Greece, and Iceland.

The only codes that mention the checking of facts are Finland's, the Soviet Union's, and Hungary's. In Finland journalists are urged to agree to the checking of facts, but at the same time it is reminded that journalistic authority lies with the editorial office. The Soviet and Hungarian draft codes are more demanding in this respect. They say it is an infringement of the code of journalistic ethics not to show a statement quoted to the person who made it despite his or her request, or to make changes to that statement without the consent of the person concerned.

The general principle of confidential sources of information and professional secrecy is simple and straightforward: the identity of a confidential source must not be disclosed. This principle is mentioned in 19 codes, and in some countries the right of journalists not to state the name of the person who has provided information is additionally enforced by legislation. According to the basic principles of journalistic ethics it is acceptable to disclose one's sources only if consent has been obtained from the person or persons concerned. The Portuguese code says the information sources can be divulged in the event that the journalist has been deceived. The Soviet and Polish codes, then, contain the explicit reservation that sources of information shall be disclosed if this is required by law. Perhaps the most surprising finding is that the Swedish and Danish codes make no reference to the protection of journalistic sources.

Freedom of information can be regarded as the very basis of professional journalism, and it also figures prominently in the journalistic codes of ethics of the CSCE countries. Freedom of information is mentioned in 22 of the codes analysed. The only codes that do not deal with this are the codes of Canada and the Soviet Union. This is not of course to say that these countries do not consider freedom of information to be of utmost importance. In Canada it is probably understood as a matter of course. In the Soviet draft code freedom of information was mentioned in the introduction in the same connection as socialism. However, when the reference to socialism was edited out of the introduction, the expression "freedom of the press" was also omitted. In all CSCE countries freedom of speech is not a matter of course. In fact the Turkish code calls upon all journalists to struggle until a permanent article is incorporated in the Constitution which says that no provisions restricting freedom of the press can be enacted.

There are 17 codes that deal with questions that can be classified under the category of the journalist and the public. The most detailed code in this respect is presented by the American Sigma Delta Chi, saying that the journalist must be free of obligations to any interest other than the public's right to know the truth. Journalists are accountable to the public for their actions: their responsibility towards the public is primary. Journalism is also defined as serving public interest in the Eastern European codes.

The journalist's rights and duties in working life are considered in 17 codes. It is quite surprising that only 13 of these recognize the journalist's right not to accept an assignment that is in conflict with his or her convictions and/or professional ethics. In Finland, this right is considered so important that it is included in the collective labour agreement. Nine codes deal with trade union rights. The British code reminds that loyalty towards the union and the employer need not clash so long as the employer makes no demands for forms of service incompatible with the honour of the profession or with the principle of trade unionism — the unionization level in Britain is fairly low.

Seven codes touch upon the question of the journalist's and his or her employer's relationship from the point of view of loyalty. Ten codes emphasize good relations with colleagues. This aspect receives very detailed coverage in the Soviet and Polish codes.

A total of 20 codes deal with professional integrity. The basic rule is that the journalist shall not accept bribes or benefits of any kind, nor must the journalist's reporting be influenced by his or her personal interests. There are 11 codes that stress the journalist's right to repudiate outside pressure — orders can only be accepted when they come from one's superiors within the editorial office.

The prevention of textual advertising is a rule which requires a clear distinction to be made between editorial material and material that has an advertising purpose. The ultimate purpose of the rule is to protect the integrity of the press and the reader — textual advertising is an undesirable form of tacit advertising. Textual advertising is also uneconomical from the mass media's point of view. This issue is covered in greatest detail in the Swedish code, which has dedicated a whole section to textual advertising. Seventeen codes denounce textual advertising.

The questions of copyright, plagiation and quoting receive fairly little attention in the codes of journalistic ethics of the CSCE countries. Only 15 codes take an explicit stand in favour of copyright. The prohibition of plagiation is mentioned most frequently.

The individual and his/her individual rights seem to be covered fairly well. With the exception of the Italian code, all the ethical codes examined mention some specific right of the individual. Journalists are required to show respect for people's private life in 19 codes; the protection of honour and reputation is contained in 22 codes; while only eight recognize the principle of making no prior assumptions of guilt and/or the principle of not disclosing identities.

Racial, religious, etc. discrimination is prohibited by 16 codes, and they do so very explicitly and in a matter-of-fact way. The prohibition of discrimination is gradually emerging as one of the more self-evident principles of journalistic ethics. The definition of what amounts to discrimination and what doesn't is ultimately decided in the context of journalistic practice, and it varies depending on the type of article.

Human rights are mentioned in six codes. Belgium, Portugal, Finland, Yugoslavia, the Soviet Union and Hungary recognize human rights as a universal ethical principle. The Belgian code says that in situations where the principle of freedom of information is in conflict with some other human right or rights, the journalist shall consult the editor-in-chief before taking the final decision as to which is given priority. The Portuguese code refers to the self-determination and independence of nations, and the Yugoslav code speaks of the equality of citizens before the law. According to the Soviet code, journalists must contribute to the elimination of poverty, hunger and disease — a statement which could be classified as reference to economic, social and cultural rights. In addition, the code takes a clear position in favour of the self-determination of nation-states. The Turkish code prohibits the publication of anything that restricts the freedom of thought or conscience or that may damage the family institution.

War propaganda is expressly prohibited only in the code of the Soviet Union.

Values are listed quite sparingly in the CSCE countries' codes of journalistic ethics: only ten make explicit reference to values. Following the socialist tradition, the Yugoslav and Soviet codes mention specific values most often, and the Yugoslav code also says that socialism is the journalist's most fundamental value.

There are only ten codes that include rules concerning material not to be published. Reference to the people's moral conscience is made in the Italian, Portuguese, Turkish and Hungarian codes. The code of the Soviet Union prohibits the use of mass media for the dissemination of pornography. Belgium, the Federal Republic of Germany, Turkey and the Soviet Union prohibit the glorification of violence and denounce sensationalism. The codes in Yugoslavia and the Soviet Union expressly forbid the publication of material that may endanger national security. The Portuguese code says that journalists must reject to deal with any themes designed for propaganda purposes. The Turkish code prohibits the exploitation of religion. The Austrian code considers it a flagrant misuse of freedom of the press to speculate on people's fears. In Germany and the Soviet Union, the codes of journalistic ethics prohibit sensational reporting on medical issues as that could lead to unfounded fears or hopes.

As far as the residual category of other rules was concerned, these were mentioned by seven codes. The Hungarian and Polish codes call upon journalists to exhibit exemplary behaviour. The same requirement is contained in the Icelandic code, which says that professional journalists shall bear in mind the basic rules of human relations. The Greek code stresses the journalist's vocation, and the Bulgarian code reminds of the journalist's responsibility. The Norwegian code says that all responsibility for the material published lies with the editor. The Finnish code requires that journalists be familiar with the legislation relevant to their work.

In a comparison of the Nordic countries we find that the Finnish code deals with the largest number of issues included in the classification scheme:

"Guidelines for Good Journalistic Practice" mention 15 of the 17 issues identified, which is the highest score among all the CSCE countries. As in other Western countries the first 11 categories figure very prominently in the code, but on the other hand there is the exceptional feature that the guidelines incorporate certain values into the professional ethics of journalists.

All the Nordic codes attach considerable importance to truthfulness and to respect for the individual's rights. Again, Iceland forms the necessary exception to the rule. The Icelandic code contains references to nine categories, the Swedish code to 11. The Swedish code includes a very detailed treatment of textual advertising. The Norwegian version is a typical representative of the Western type of code: the 11 first categories are covered quite thoroughly. In addition, the Norwegian code contains a reference that is classified under category 17. The Danish guidelines are the least comprehensive of the Nordic codes, with only six relevant references. Its main concern is with the protection of the individual.

The Dutch and Belgian codes have ten relevant references each. The figures for the UK/Irish code is nine, for the Italian code seven. The wording of the Italian code is not sufficiently clear and accurate, which is no doubt at least partly due to the fact that it is more than 30 years old. The Austrian code contains 10 relevant references, the Greek code nine.

Portugal has a code that covers many aspects of the practice of journalism, scoring in 13 of our categories. The rights of the individual receive only marginal attention, but on the other hand it attaches considerable importance to the respect for human rights. The two French codes are almost identical in content (10 and 9), but the latter version is more carefully and thoroughly worded.

The German code prohibits sensational reporting on violence and on medical research that is still in its early stages. It contains references to 11 aspects included in the classification. The Swiss code also contains 11 relevant references, and it devotes an unusual amount of space to the journalist's terms of employment.

The Turkish code is fairly comprehensive, with 12 relevant references. The code emphasizes the significance of freedom of information. The strong presence of Islamic culture is reflected in the code's emphasis on the sanctity of the family and religious convictions.

The code of French-speaking journalists in Canada is somewhat less comprehensive (8) than the US code (9). The latter is characterized by its strong emphasis on the pursuit of truth and service of the general public.

The Soviet code, which is very comprehensive, contains references to 14 of the 17 categories included. On the whole the Soviet code covers all relevant aspects of journalistic ethics in considerable depth, although it mentions neither freedom of information nor the repudiation of outside influence. The code no longer mentions socialism, but it still places heavy emphasis on values.

A clear emphasis on socialist values is present in the Yugoslav code, which nevertheless also gives space to freedom of information. What is more, the Yugoslav code deals with this aspect in distinctly Western terms; it even employs the concept of "free flow of information". There are 12 relevant references in the Yugoslav code.

The Polish code is outdated in style and in all likelihood it will be revised within the near future. In its present form the Polish code deals quite comprehensively with professional solidarity, and it specifies in great detail the punishments that will follow for infringements of professional ethics. Poland has 11 relevant references.

The Hungarian code covers a wide range of issues, with references to the same number of categories as are made in the Finnish case: 15. The Hungarian code deals quite extensively with the issue of truth and freedom of information. In addition, it reminds that the servants of the public must stand up to public criticism.

Bulgaria has recently produced a new basic code of ethics which gives a fairly concise treatment of the most relevant matters. The code includes references to 12 categories and, as the Western codes, emphasizes freedom of information, truth and the rights of the individual.

In the light of our analysis it would seem that there is developing among the CSCE countries some sort of basic, universal model of journalistic codes where the accent is on truth, freedom of information, and protection of the individual. Closely related to these fundamental requirements is the journalist's task as servant of the general public. A good journalist uses only honest means in the acquisition and processing of information. The principle of protecting confidential sources can only be violated if demanded by a court of law — if even there. It would be nice to see a greater number of journalistic codes incorporate in their texts the right to follow one's conscience and codes of professional ethics. The journalist's personal integrity and rejection of outside influence represent the opposite side of the same coin — unless journalism enjoys full independence from various interest groups, it will lose its credibility. The prohibition of textual advertising is also directly relevant to the issue of credibility. The prohibition of plagiation supports the right to one's own work. The prohibition of discrimination is being included in an increasing number of ethical codes. There is also growing unanimity on the importance of respecting human rights.

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List of codes of journalistic ethics

Nordic countries:

Denmark	Rules of Good Journalism. Adopted by the Danish Commission for the Press, 27 October 1981.
Finland	Guidelines for Good Journalistic Practice. Adopted by the Union of Journalists in Finland, 7 August 1983.
Iceland	Rules of Ethics in Journalism. Adopted by Iceland's Union of Journalists, 1988.
Norway	Code of Ethics. Adopted by the Norwegian Press Association, 1936, last revised 1987.
Sweden	The Code of Conduct for Press, Radio and Television. Adopted by the Cooperation Council of the Press in Sweden, 1982, revised August 1990.

West European countries:

Austria	Principles Governing Journalistic Work: Code of Ethics for the Austrian Press. Adopted by the Austrian Press Council, 31 January 1983.
Belgium	Code of Journalistic Principles. Adopted by the Belgian Association of Newspaper Publishers and the General Association of Professional Journalists, 1982.
FRG	Journalistic Principles; Press Codex. Adopted by the German Press Council in co-operation with the press unions and handed over to the Federal President Dr. Gustav W. Heinemann, 12 December 1973, revised 14 February 1990.
France I	Charter of the Professional Duties of French Journalists. Adopted by the National Syndicate of French Journalists in 1918 and revised and completed by the same syndicate in 1938.
France II	Declaration of Ethical Principles of the Journalistic Profession. Proposed in the preamble to the National Collective Agreement, 1977.
Greece	Ethical Morals. Approved by Members of Editorial Boards of Athens Dailies, 2 June 1978.
Italy	Principles of Professional Ethics of the National Council of the Italian Press, June 1957.

Netherlands	Declaration of Principles on the Conduct of Journalists. The Netherlands Union of Journalists accepted the IFJ (The International Federation of Journalists) Declaration of Principles, first adopted at Bourdeaux 1954, and amended by the 18th IFJ World congress, 2-6 June 1986.
Portugal	Deontology Code of Journalism. Adopted by the Extraordinary General Assembly of the Union of Journalists, September 1976.
Switzerland	Declaration of the Duties and the Rights of Journalists. Adopted by the Swiss Press Association, June 1972.
Turkey	Professional Principles of the Press. Adopted by the Turkish Press Council, April 1989.
UK & Ireland	Code of Professional Conduct. Adopted by the Annual Delegate Meeting of the National Union of Journalists of the United Kingdom and Ireland, 4 April 1987.

East European countries:

Bulgaria	Rules of Journalistic Etiquette. Adopted by the Bulgarian Union of Journalists, October 1990.
Hungary	Code of Journalists' Ethics. Adopted by the General Assembly of the State Union of Hungarian Journalists, September 1989.
Poland	Moral Code for Journalists. First adopted by the Trade Union of Journalists of the People's Republic of Poland in 1945 and revised several times as the code of the Association of Polish Journalists (1951-1981). The present version adopted by the second Congress of the Association of Journalists of the Polish People's Republic, 1 October 1987.
Soviet Union	Code of Professional Ethics of Journalists. Adopted by the first Congress of the USSR Union of Journalists on Confederative Basis, 24 April 1991.
Yugoslavia	Yugoslav Journalists' Code. Adopted by the Federation of Yugoslav Journalists, October 1988.

North American countries:

Canada	Charter of Professional Integrity of the Canadian Association of French Language Journalists, 1964.
USA	Code of Ethics. Adopted by the Society of Professional Journalists, Sigma Delta Chi, 1926, last revised 1987.

Errata

The final version of the Soviet Code reached us only after the present report was printed (the official text was published in Russian in the monthly *Zhurnalist* No. 6/1991). At this stage we noticed one essential change to the draft version on which the analysis was based: textual advertising was dropped from the list of violations of journalistic ethics. This — as such a thought-provoking development — requires the following changes in the preceding text:

page 58: The paragraph beginning "The Soviet code regards it ... " is obsolete.

page 79: Table 7, category 9: delete marking for Soviet Union, whereby total number of categories represented in the Soviet code is 13 (and the category of textual advertising is present in 16 codes). Note respective change also on page 88.

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Tiedotusopin laitos

UNIVERSITY OF TAMPERE
Department of Journalism
and Mass Communication

June 1991

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